



Department of  
**Labor & Workforce  
Development**

# **MONITORING GUIDE**

## **Program Years 2019-2020**



November 22, 2019

Chris Risher  
TN Department of Labor and Workforce Development  
220 French Landing Drive, 4B  
Nashville, TN 37243

Dear Mr. Risher,

I am pleased to inform you that the FY20 Subrecipient Monitoring plan for the TN Department of Labor and Workforce Development has been reviewed and approved by the Central Procurement Office. You can reach me at [kevin.j.wieck@tn.gov](mailto:kevin.j.wieck@tn.gov) or 615-532-6781 if you have any questions or concerns.

Sincerely,

Kevin Wieck  
Grants Program Manager

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# Monitoring Guide 2019

## Introduction

Monitoring and technical assistance are integral parts of the Tennessee Department of Labor and Workforce Development's (TDLWD) oversight responsibilities, as required by law. Monitoring is an essential part of program and financial management to ensure compliance with applicable laws, regulations, integrated workforce plans, provider agreements, policies, and procedures. Monitoring identifies areas of strength and weakness in operations to develop program performance. Technical assistance improves program operation and management capabilities.

TDLWD's approach to program and fiscal monitoring of each Local Workforce Development Area (LWDA) uses a combination of on-site monitoring and desktop monitoring, as prescribed in Workforce Innovation and Opportunity Act (WIOA) Section 183. Special on-site reviews may be conducted to investigate allegations of mismanagement or to clarify questionable findings during monitoring. Special reviews may or may not result in corrective action.

The State must conduct an annual, on-site monitoring review of each LWDA's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). Specific information will be requested from the local area and will be reviewed virtually prior to the on-site review. The TDLWD has established a more strategic method for programmatic and performance monitoring—through the implementation Jobs4TN—which allows for virtual (desktop) monitoring of participant files and the upload of supporting documentation, including policies and program notes. On-site monitoring will still be conducted at a minimum of once per program year for both programmatic (carried out by Workforce Services staff) and fiscal monitoring (carried out by PAR staff).

Monitoring may also occur at the discretion of TDLWD and as need is indicated by Local Workforce Development Boards (LWDBs). This flexibility allows for collaboration between the TDLWD and the LWDBs.

## Process/Methodology

Oversight and monitoring will focus on LWDA's systems to ensure that acceptable standards for fiscal accountability, program administration, procurement, and integrated service delivery are established and in practice. In addition to the annual monitoring and required formal monitoring reviews, oversight and programmatic reviews will be conducted year-round via program management and Program Integrity staff to ensure compliance with applicable administrative requirements—specifically identification of system strengths, weaknesses, and required corrective actions.

## Requirements of LWDBs to Monitor All Local WIOA-Funded Contracts

WIOA Section 185(c) provides that:

*(c) GRANTEE INFORMATION RESPONSIBILITIES.—Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title—*  
*(1) shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;*

*(2) shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188;*

*(3) shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title; and*

*(4) shall, to the extent practicable, submit or make available (including through electronic means) any reports, records, plans, or any other data that are required to be submitted or made available, respectively, under this title.*

### **Program Oversight**

As outlined in WIOA Section 107(d)(8), LWDBs are required to conduct monitoring and oversight of their subrecipients. In order to ensure LWDBs are properly conducting oversight of WIOA funds, TDLWD requires LWDBs to establish and execute tools and guides to outline how monitoring activities will be conducted. In addition to conducting monitoring and oversight as the grantee, TDLWD will also monitor LWDBs to review their monitoring activities.

Pursuant to WIOA Section 107(d)(8), the LWDB (in partnership with the Chief Local Elected Official [CLEO] for the LWDA) must:

- Conduct oversight for local youth workforce investment activities, local employment and training activities for adults and dislocated workers, and the One-Stop Delivery System in the local area;
- Ensure the appropriate use and management of funds provided for these activities; and
- Ensure appropriate use, management, and investment of funds to maximize performance outcomes under WIOA Section 116.

### **LWDB Monitoring Plan Requirement**

Each LWDB must prepare, and make available to the public on their website, a monitoring schedule and a policy addressing how they will conduct oversight of their subrecipients, pursuant to 2 CFR 200.331.

### **LWDBs and Fiscal Agents**

Each subrecipient of funds under WIOA Title I must conduct quarterly oversight and monitoring of its WIOA programs and contractors in order to:

- Determine that expenditures have been made against the proper cost categories and within the cost limitations, specified within WIOA and the regulations in this part;
- Determine whether there is programmatic compliance with WIOA, including additional applicable laws and regulations;
- Assure compliance with 2 CFR 200 (specifically 2 CFR 200.34, Expenditures; 2 CFR 200.84, Questioned Cost; and 2 CFR 200.85, Real Property); and
- Determine compliance with the nondiscrimination, disability, and equal employment opportunity requirements of WIOA Section 188.

“Subaward” means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

“Contractor” means an entity that receives a legal instrument (i.e. contract) by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (2 CFR 200.22, Contracts). The responsibilities of a contractor are to:

- Ensure monitoring of service providers on an annual basis and at least 60 business days prior to the expiration of the service provider or subrecipients’ contract with its subcontractors. This requirement includes the submission of monitoring reports and resolutions to the TDLWD Program Integrity unit ([workforce.board@tn.gov](mailto:workforce.board@tn.gov)).
- Provide all requested documents to the TDLWD Program Accountability Review Unit (PAR unit) within 15 business days prior to the scheduled monitoring date.
- Have documents available which were previously identified by the TDLWD as required for the on-site review. Documents must be presented in an organized manner in order to facilitate expedient examination by monitors.
- Ensure appropriate staff is available at the on-site location, and on all monitoring date(s), to assist TDLWD monitors.

### **Required LWDB Policies and Procedures**

As a part of their oversight or monitoring role, each LWDB and fiscal agent must develop written policies and procedures to monitor WIOA-funded programs and the delivery of integrated services. All LWDB approved policies must be signed by the LWDB Chair to demonstrate that they have been reviewed by the LWDB. Furthermore, all LWDB-approved policies must be made available to the public through the LWDA website.

Local areas are required to have LWDB-approved policies to provide guidance on the following topics:

- Adult priority of service
- Local Workforce Development Area Staff Conflict of Interest (to include the CLEO, LEOs, LWDB, LWDB staff, OSO, and CSP)
- Grievance and Complaint
- Incumbent Worker Training Grants
- Individual Training Accounts
- Initial Assessment of Individuals Seeking Services in an American Job Center
- LWDB Meeting Minutes
- LWDB Member Nomination
- Minimum Participant Cost Rate
- OSO and CSP Procurement
- SCSEP Participant Approved Break
- Supportive Services
- Verifying Identity of Program Participants
- Youth Eligibility

LWDBs must ensure compliance at the local level concerning administrative and financial requirements, policies, and procedures in order to ensure performance goals are being achieved. Policies must be approved by the LWDB. Each LWDB should have a process to review, implement, and update policies. Local-level policies and guidance must align with all approved State Workforce Development Board (SWDB) policies and guidance, which can be found through the following link:

<https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html>

These specific monitoring policies and procedures may be consolidated into one comprehensive document. However, monitoring policies may also be separated into two documents which distinctly and separately address LWDB and financial compliance requirements. Written policies and procedures must describe:

- The roles and functions of LWDBs, LWDB staff, and fiscal agents in their oversight or monitoring processes;
- Who, by title, is responsible for the monitoring of each program activity;
- The types of reports which will be prepared as a result of such monitoring;
- To whom reports will be distributed;
- The scope and frequency of monitoring efforts for each program activity consisting of:
  - Monitoring activities by using uniform monitoring tools, desk reviews, on-site visits, and telephone contacts resulting in a summarized written report;
  - Conducting on-site reviews of policies, plans, and procedures governing all segments of their program activities and program operations (reviews must be conducted at least once during the program year);
  - Conducting pre-award financial review or on-site post-award monitoring of recipients, who have little or no workforce program experience, no later than 120 business days after the award of a contract;
  - Monitoring program accountability of each subrecipient providing service to participants to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. LWDBs must monitor each subrecipient once annually and no less than 60 business days prior to the expiration date of the contract; and
  - Reviewing a sample of participants' files to determine compliance with required laws, policies, plans, and procedures at the federal, state, and local levels.
- The methods which will be used to monitor program activities;
- The methods which will be used for procurement and financial monitoring:
  - General procurement standards, as outlined in 2 CFR 200.318;
  - The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.
  - Procurement standards used by the TDLWD are contained in the Grant Management and Subrecipient Monitoring Policy (Policy Number 2013-007), published by the Central Procurement Office.
- Who, by title, is responsible for ensuring corrective actions are taken when problems are found;
- The time-frame, in terms of calendar days or weeks, for completion of corrective actions;
- Guidelines for follow-through monitoring, when necessary, to determine if corrective action has been completed; and
- An appeal process for disagreements.

# Providing Notice of Equal Employment Opportunity and Nondiscrimination

## General Prohibitions on Discrimination

*“No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries, applicants, and participants only, citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I financially assisted program or activity”. (29 CFR 38.5)*

## Providing Initial and Continuing Notice

- All recipients of financial assistance under WIOA (excluding the beneficiaries of WIOA programs or activities) must provide initial and continuous notice that they do not discriminate on any prohibited basis, as outlined under “General Prohibitions on Discrimination”.
- For the purpose of equal employment opportunity and nondiscrimination regulations, recipients include but are not limited to:
  - State-level agencies that administer WIOA Title I funds, whether financed in whole or in part by WIOA;
  - State Workforce Agencies;
  - State and Local Workforce Development Boards;
  - Local grant recipients;
  - One-Stop Operators;
  - Service providers, including eligible training providers;
  - On-the-Job Training (OJT) employers;
  - Job Corps contractors and center operators;
  - Job Corps national training contractors;
  - Outreach and admissions agencies, including Job Corps contractors that perform these functions;
  - Placement agencies, including Job Corps contractors that perform these functions; and
  - Other National Program recipients.
- This non-discrimination notice must be provided to:
  - Registrants, applicants, and eligible applicants/registrants;
  - Participants;
  - Applicants for employment and employees;
  - Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
  - Subrecipients that receive WIOA Title I financial assistance from the recipient; and
  - Members of the public, including those with impaired vision or hearing and those with limited English proficiency.

*Recipients must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. (29 CFR 38.34, 29 CFR 38.4(h), 29 CFR 38.15)*

- The Equal Opportunity is the Law poster—which is available in English, Arabic, Chinese, and Spanish—must be posted prominently, in a reasonable numbers of places, in available and conspicuous physical locations and on the recipient’s website.
- The international symbol for accessibility must be shown to direct individuals to an accessible entrance, including the telephone number to call if accommodation is needed to receive

services. Information concerning these regulations can be found in the Methods of Administration, specifically Element V.

- If the customer needs language assistance, and is unable to identify the language in which they need assistance, the Avanza Language Line can help to identify the language the customer is speaking. (29 CFR 38.36[c])
- The following should be observed concerning the Equal Employment Opportunity is the Law Signature Form:
  - All individuals registered in WIOA should read, understand, and sign the complaint procedure signature form. A signed copy must be given to the individual and an additional signed copy must be placed in the individual's file.
  - LWDBs must provide the complaint procedure signature form to all current employees (regardless of whether the positions are partially or fully-funded by WIOA) and ensure that all new employees receive this form when they begin employment (again, regardless of whether the positions are partially or fully-funded by WIOA). All employees should read, understand, and sign the complaint procedure form which should then be placed in their personnel file.
  - Applicants for WIOA services or applicants for employment with the recipient have access to the appropriately displayed equal employment opportunity and nondiscrimination posters and information.
  - The complaint signature forms are printed in English. LWDBs should use Avanza Services to translate the form for use by service providers located in an area that has a substantial number of participants who require notification in other languages.
  - Orientation presentations to new participants, new employees, and/or the general public regarding WIOA financially-funded programs must include a discussion of rights under the nondiscrimination and equal employment opportunity provisions of WIOA.

### **Publications, Broadcasts, and Other Communications**

Recipients must indicate that the WIOA Title I financially-assisted program or activity in question is an “equal opportunity employer/program” and that “auxiliary aids and services are available upon request to individuals with disabilities.” This indication must be included in recruitment brochures and other materials that are ordinarily distributed or communicated—whether in written, oral, electronic, and/or paper format—to staff, clients, or the public at large to describe programs financially assisted under Title I of WIOA, including the requirements for participation.

Where such materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or equally effective telecommunications system—such as a relay service—used by the recipient.

*“Recipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIOA Title I-financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I-financially assisted program or activity is prohibited by Federal law), and indicate that auxiliary aids and services are available upon request to individuals with disabilities.” (29 CFR 38.38[b])*

# TDLWD Central Office Monitoring: Workforce Service Program Staff Procedures

## Overall Responsibilities

Program monitoring is primarily conducted through desktop reviews performed by Workforce Services staff. Fiscal monitoring is not part of this oversight function, as this is conducted by the Program Accountability Review unit, addressed in the following section.

During these reviews, Workforce Services staff pulls participant sample reports from Jobs4TN for the following programs:

- WIOA Title I Adult
- WIOA Title I Dislocated Worker
- WIOA Title I Youth
- WIOA Title III Wagner-Peyser
- Jobs for Veterans State Grants
- Reemployment Services and Eligibility Assessment (RESEA)
- Senior Community Service Employment Program (SCSEP)
- Supplemental Nutrition Assistance Program (SNAP)
- Trade Adjustment Assistance (TAA)

## Scheduling

Desktop reviews will be conducted quarterly for each LWDA within Tennessee’s workforce system.

## Time Schedules

Desktop monitoring reviews will be performed on a quarterly basis and in the following manner:

<b>Q4 2019: October 1 – December 31</b>	<p><b><u>October, November:</u></b></p> <ol style="list-style-type: none"> <li>1. Program Managers pull Q4 2019 monitoring samples, Workforce Services staff performs desktop review</li> <li>2. Program Managers compile results, send to Program Integrity staff</li> </ol> <p><b><u>December:</u></b></p> <ol style="list-style-type: none"> <li>1. Program Integrity staff compiles samples for all programs, sends monitoring report to CLEO, LWDB, and LWDB staff</li> </ol>
<b>Q1 2020: January 1 – March 31</b>	<p><b><u>January, February:</u></b></p> <ol style="list-style-type: none"> <li>1. LWDB staff ensures findings in Q4 2019 desktop monitoring samples are resolved</li> <li>2. LWDB staff submits resolved desktop review findings to Program Integrity staff</li> <li>3. Program Managers pull Q1 2020 monitoring samples, Workforce Services staff performs desktop review</li> <li>4. Program Managers compile results, send to Program Integrity staff</li> </ol> <p><b><u>March:</u></b></p> <ol style="list-style-type: none"> <li>1. Program Integrity staff compiles samples for all programs, sends monitoring report to CLEO, LWDB, and LWDB staff</li> <li>2. Workforce Services staff reviews 10% of findings resolved by service provider, documents unresolved findings, sends report to Program Manager</li> </ol>

<p><b>Q2 2020:</b> <b>April 1 – June 30</b></p>	<p><b><u>April, May:</u></b> 1. LWDB staff ensures findings in Q1 2020 desktop monitoring samples are resolved 2. LWDB staff submits resolved desktop review findings to Program Integrity staff 3. Program Managers pull Q2 2020 monitoring samples, Workforce Services staff performs desktop review 4. Program Managers compile results, send to Program Integrity staff</p> <p><b><u>June:</u></b> 1. Program Integrity staff compiles samples for all programs, sends monitoring report to CLEO, LWDB, and LWDB staff 2. Workforce Services staff reviews 10% of findings resolved by service provider, documents unresolved findings, sends report to Program Manager</p>
<p><b>Q3 2020:</b> <b>July 1 – September 30</b></p>	<p><b><u>July, August:</u></b> 1. LWDB staff ensures findings in Q2 2020 desktop monitoring samples are resolved 2. LWDB staff submits resolved desktop review findings to Program Integrity staff 3. Program Managers pull Q3 2020 monitoring samples, Workforce Services staff performs desktop review 4. Program Managers compile results, send to Program Integrity staff</p> <p><b><u>September:</u></b> 1. Program Integrity compiles samples, sends monitoring report to local area staff 2. Workforce Services staff reviews 10% of findings resolved by service provider, notes unresolved findings 3. Workforce Services program staff writes report for the year to identify persistent findings that relate to their programs 4. Program Managers send reports to Program Integrity to brief the State Board, results placed into PY 2020-2021 Monitoring Guide</p>
<p><b>Q4 2020:</b> <b>October 1 – December 31</b></p>	<p><b><u>October, November:</u></b> 1. LWDB staff ensures findings in Q3 2020 desktop monitoring samples are resolved 2. LWDB staff submits resolved desktop review findings to Program Integrity staff 3. Program Managers pull Q4 2020 monitoring samples, Workforce Services staff performs desktop review 4. Program Managers compile results, send to Program Integrity staff</p> <p><b><u>December:</u></b> 1. Program Integrity staff compiles samples for all programs, sends monitoring report to CLEO, LWDB, and LWDB staff 2. Workforce Services staff reviews 10% of findings resolved by service provider, documents unresolved findings, sends report to Program Manager</p>

### **Workforce Services Staff Monitoring Process**

Workforce Services staff will generate a monitoring sample for their respective program using reports from Jobs4TN. Training on eligibility determination, data validation, and the criteria used to generate reports will be provided by Performance unit staff.

These reports will provide oversight of a participant’s eligibility to receive WIOA services—both from enrolled and exited participants—and ensure that supporting documentation is available in the participant’s file. Staff will document instances of noncompliance to note where corrections are required; this review will also inform future technical assistance training. Once the review has been conducted, documentation will be sent to the Program Integrity unit for final review before disbursement to the LWDBs and their staff.

## **Notification Process**

The Program Integrity unit will notify the LWDB, and its staff, of the results from the desktop monitoring. This correspondence will include supporting documentation to demonstrate errors found during participant file reviews. Instances of noncompliance identified during the desktop review must be corrected within 30 business days from reception of the monitoring report from the Program Integrity unit.

## **Corrective Action**

The LWDB, and its staff, must work with the One-Stop Operator to resolve issues uncovered during the desktop review. Corrective action must take into account recurring issues and technical assistance provided by Workforce Services staff. The One-Stop Operator will have 30 business days from the issuance of the desktop review results to correct noncompliance findings that have been identified. LWDB staff must notify the Program Integrity unit once corrections have been made.

Findings from the desktop review will receive a follow-up action to ensure that errors have been resolved. Workforce Services staff will review the corrected participant files to verify that changes are in compliance with federal, state, and local regulations; all files will be reviewed on a pass/fail basis. Any instance of continued noncompliance will be noted; the OSO will not have additional opportunities for to make corrections. Files identified as chronically noncompliant will be collated and analyzed to create technical assistance, which will be provided during the annual on-site visit.

As always, it is the responsibility of the One-Stop Operator to monitor programs and ensure that services are provided in compliance with federal, state, and local regulations.

## **Annual On-Site Visit**

Throughout the program year, Workforce Services staff will conduct at least one on-site visit to each LWDA. These visits are primarily intended to provide technical assistance to resolve issues found during the desktop monitoring review. This face-to-face meeting will provide an opportunity to address areas of concern and to provide clarification to programmatic and fiscal processes on an as-needed basis.

Visits will have a duration of 3 business days and will include reports that comprehensively address policies, agreements, and contracts as they relate to applicability and fulfillment of agreed-upon requirements.

## **Special Award Grant Monitoring**

Aside from awards given under WIOA, the Special Projects unit works to apply for additional grants to meet the Governor's initiatives (e.g. service to justice-involves individuals, apprenticeship trainings, and rural development). Funds received through these awards supplement efforts to provide job training and workforce development to all Tennesseans.

Additional grants will be monitored in the same manner as other Workforce Services programs, such as WIOA Title I and SNAP; these grants are considered 'mini programs'. At minimum—once a grant has been awarded—the TDLWD Program Director responsible for administration will evaluate the duties of their team, such in subject areas such as: programmatic, fiscal, and monitoring oversight.

These grants will also be overseen by the local areas. The career service provider will ensure that participants receive the benefits of these awarded funds, and the OSO will provide monitoring reports to the LWDB and its staff. In order to assure seamless administration and oversight of funds, the LWDB staff will report to the State through the TDLWD Program Director, and all correspondence will include the TDLWD Regional Director.

### **Policy and Contract Reviews**

The sample of the core LWDB-approved policies—listed on page 6 of this guide—will be reviewed annually to ensure that they are updated regularly, reflect the most up-to-date guidance provided by the federal and state governments, and that instruction is adhered to by subrecipient staff. To carry this out, the sample of these policies will be selected prior to the on-site visit; these policies will be analyzed by Program Accountability staff and a checklist will be created to ensure that the review is conducted in an impartial, uniform manner across the State’s workforce system. Subrecipient staff will not be provided with a list prior to the on-site visit.

### **Knowledge Assessments and Staff Interviews**

Aside from policy, all subrecipient staff will receive ongoing training and technical assistance; a component of this continuing education will be an assessment to document the level of staff understanding of WIOA and Tennessee’s workforce system. Assessments will be created by Workforce Services staff and will be based upon topics where technical assistance has been provided but is not successful.

During assessments staff must demonstrate knowledge of topics such as:

- The Governor’s three initiatives
- WIOA entities (e.g. CLEO, LEO, OSO, CSP, etc.)
- The role of each entity, including reporting structure
- Firewall restrictions
- Program-specific topics related to service provision and participant eligibility

Staff who fails to demonstrate command of the subject matter will receive mandatory technical assistance to address knowledge gaps; additionally, a corrective action plan will be required to outline how proficiency will be achieved. This plan must be created by the LWDB staff or OSO, depending on the subject matter, and will be jointly reviewed by Program Integrity and Workforce Services staff.

Finally, subrecipient staff will be interviewed individually to ascertain level of programmatic knowledge. These interviews will be compared against training assessments to ensure that staff confidently address questions, and effectively explain components of, the workforce system. Any identified gaps in knowledge will be addressed through additional, mandatory technical assistance training.

## **TDLWD Central Office Monitoring: Performance Accountability Review (PAR) Procedures**

### **Overall Responsibilities**

Program and financial monitoring is also performed through on-site visits. During, and in advance of these visits, TDLWD will request a sample of documentation to monitor activities and programs.

The TDLWD will utilize their respective WIOA Monitoring Tools—such as program attribute sheets—to serve as the foundation for oversight/monitoring activities. Furthermore, the State must conduct an annual on-site monitoring review of each LWDA's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). TDLWD will prepare and distribute these monitoring instruments for information and self-assessment purposes.

The Program Integrity, Fiscal, and PAR units will review locally-provided supportive documentation to determine compliance with all applicable regulations and standards. Monitoring and reviews will take place throughout the year. For on-site monitoring, the PAR unit will provide instructions—by separate correspondence—on required documents to be submitted to the PAR unit, within 15 business days prior to scheduled on-site monitoring visits; the PAR unit will also supply a list of documents which must be available to monitors prior to and during the on-site review.

The PAR unit will identify a Comprehensive One-Stop Center in the LWDA where the on-site system monitoring will be conducted, and will issue monitoring reminders to the LWDB staff prior to scheduled on-site monitoring visits. Specific areas of emphasis, which are contained within the TDLWD's WIOA Monitoring Tool, include but are not limited to:

- System Administration and Effectiveness of Monitoring:
  - LWDB governance, bylaws, composition, minutes, re-certification, oversight and monitoring responsibilities;
  - Local agreements and contracts; and
  - Memorandums of Understanding (MOUs).
- Fiscal Compliance Oversight and Monitoring:
  - Fiscal agent operational policies and procedures;
  - Accounting system, entries, and documentation;
  - Procurement methods and documentation;
  - Contracts verification (i.e. purchase, rent, leases);
  - Internal controls; and
  - Personnel and payroll records.
- Program Administration and Effectiveness Monitoring:
  - Integrated delivery of Adult and Dislocated Worker services and Youth services funded by WIOA; and
  - National Emergency Grants.

### **Time Schedules**

The PAR unit and Workforce Services Division will jointly establish monitoring schedules.

### **Notification Process**

The PAR unit will provide written notice to each entity being monitored at least 30 business days prior to a review being conducted. The written notice will inform the entity of:

- The dates for the review
- Which programs will be reviewed
- The contract number of each contract that will be examined, and
- The estimated time of arrival.

If the date identified in the written notification is not convenient for the entity being monitored then the entity must contact the monitors immediately. The entity and the monitors will determine a mutually-satisfactory date and the review will be rescheduled. However, State monitors and TDLWD

executive management reserve the right to conduct unscheduled or monitoring reviews as appropriate.

### **Entrance Conference**

Prior to the start of each on-site monitoring review the PAR unit—which may also include the Program Integrity unit, Fiscal Unit, Technical Assistance unit, and Program Staff as needed—will hold an entrance conference with the LWDB staff, fiscal agent, and other interested parties to establish the purpose, parameters, and time-frame of the visit. During this meeting, any relevant information will be discussed which may enhance the effectiveness of the review. All previously requested documents must be available for review and distribution, including items to be retained by the monitoring team.

### **PAR Monitoring Process**

The PAR unit, in conjunction with the Program Integrity unit, will use the annually-updated monitoring guide to conduct fiscal system and program activity reviews. The guide will be amended as regulatory changes occur.

- The monitoring review may be conducted through desktop evaluation, on-site evaluation, or through a combination of these two processes.
- PAR unit monitors are authorized to monitor any entity receiving WIOA funds at the Comprehensive and Affiliate American Job Centers, including any contracts/entities utilizing WIOA funds through LWDBs. Their review may include, but is not limited to: examining program records, questioning employees, interviewing participants, and entering any site or premises which receive WIOA funds.
- Random sampling techniques will be used to perform the review of program records. Monitors will hold an exit conference with appropriate officials for each review conducted.

After the monitors finish their examination, working papers will be established during the review and maintained by the TDLWD.

### **Exit Conference**

An exit conference call will be conducted after each TDLWD monitoring review. The exit conference call will be provided to the LWDB and CLEO to identify issues that may result in noncompliance and/or questioned costs. Additional findings and/or questioned costs may arise after the on-site review and exit conference call are concluded.

### **Monitoring Report**

The PAR unit will issue the monitoring report within 30 business days from the conclusion of the monitoring review.

### **Corrective Action**

The monitored entity will submit a corrective action plan within 30 business days subsequent to PAR releasing a monitoring report that requires corrective action. Corrective action must be provided within 30 business days of the receipt of the monitoring report from the PAR unit.

### **Progress Report**

If the initial corrective action provided to TDLWD is not accepted, the entity will submit a progress report each month until the corrective action has been accomplished.

## Program Descriptions

### Wagner Peyser

Wagner-Peyser Act-funded workforce preparation services are an integrated component of the nation's American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name) system. They are coordinated with other adult programs under the Workforce Innovation and Opportunity Act (WIOA) to ensure that job seekers, workers, and employers have convenient and comprehensive access to a full continuum of workforce related services. The most distinguishing feature of the Wagner-Peyser Employment Service is that it is the only "universally accessible" public workforce program.

Wagner-Peyser-funded services support the development of a competitive workforce for today's global economy. Under the Wagner-Peyser Act, unemployed individuals and other job seekers obtain critical job search, assessment, and career guidance services to support them in obtaining and retaining employment. In addition, Wagner-Peyser-funded activities assist employers with building skilled, competitive workforces through recruitment assistance, employment referrals, and other workforce solutions. Activities funded under the Wagner-Peyser Act also include the development and dissemination of regional workforce information and related resources, which provide both job seekers and employers with comprehensive and accessible economic and industry data to inform workforce and economic development activities.

### Senior Community Service Employment Program

The purpose of the Senior Community Service Employment Program (SCSEP) program is to provide, foster, and promote useful part-time work opportunities (usually 20 hours per week) in community service employment activities for unemployed low-income persons who are 55 years of age and older. To the extent feasible, SCSEP assists and promotes the transition of program participants into unsubsidized employment.

### Trade Adjustment Assistance

The purpose of the Trade Adjustment Assistance (TAA) program is to provide assistance to workers adversely affected by foreign trade. Services are provided under the TAA program to enable workers to return as quickly as possible to work that will use the highest skill levels and pay the highest wages, given the workers' preexisting skill and educational levels, as well as the condition of the labor market.

The Trade Act of 1974 has been amended multiple times-most recently by the Trade Adjustment Assistance Reform Act of 2002 (Pub. L. No. 107-210) (TMRA or Trade Act of 2002); the Trade and Globalization Adjustment Assistance Act of 2009 (TGMA or Trade Act of 2009) (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5); the Trade Adjustment Assistance Extension Act of 2011 (TAAEA or Trade Act of 2011) (Title II of Pub. L. No. 112-40); and the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015 or Trade Act of 2015) (Title IV of the Trade Preferences Extension Act of 2015, Pub. L. No. 114-27).

Compared to the Trade Act of 2002, the Trade Act of 2011 expanded eligibility of the TAA program and replaced Alternative Trade Adjustment Assistance (ATAA) with Reemployment Trade Adjustment Assistance (RTAA) - but at the 2002 benefit levels. The TGAAA extended the TAA program through December 31, 2010, and the Omnibus Trade Act of 2010 further extended TAA through February 15, 2011. After that date, the TGAAA amendments to the Trade Act expired, and the TGAAA required the TAA program to operate under the TAARA provisions, through

October 21, 2011. On this date, the TAAEA was passed, which reauthorized many of the provisions under the Trade Act of 2009, but with slight modifications. The TAAEA amendments to the Trade Act expired on December 31, 2013, and the TAAEA required the TAA program to operate under the provisions of the Trade Act of 2002, with three provisions of the Trade Act of 2011 remaining (referred to as Reversion 2014). The TAARA 2015 both amends and reauthorizes the TAA Program. The TAARA 2015 restores the worker group eligibility and benefits established by TAAEA.

The TAARA 2015 also (1) authorizes the operation of the 2015 Program and continuation of the 2002 Program, the 2009 Program, and the 2011 Program through June 30, 2021; (2) provides a 90-day transition period for Reversion 2014 Program participants to transition to the 2015 Program; (3) expands coverage of certifications of petitions filed since January 1, 2014 for 90 days; (4) requires reconsideration of negative determinations of petitions filed since that date and before the date of enactment under 2015 Act certification requirements; and (5) reauthorizes the Health Coverage Tax Credit (HCTC) program benefit for eligible TAA participants. TAARA 2015 also added new requirements to align performance reporting for the TAA Program with the requirements of the Workforce Innovation and Opportunity Act (WIOA).

### **WIOA Title I (Adult, Youth and Dislocated Worker Programs)**

The Workforce Innovation and Opportunity Act of 2014 (WIOA), which supersedes the Workforce Investment Act of 1998 (WIA), authorizes formula grant programs to States to help job seekers access employment, education, training and support services to succeed in the labor market. Using a variety of methods, States provide employment and training services through a network of American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name). The WIOA programs provide employment and training programs for adults, dislocated workers, and youth, and Wagner-Peyser employment services administered by the Department of Labor (DOL). The programs also provide adult education and literacy services that complement the Vocational Rehabilitation State grants awarded by the U.S. Department of Education that assist individuals with disabilities in obtaining employment and helps job seekers to achieve gainful employment. Youth employment and educational services are available to eligible out-of-school youth, ages 16 to 24, and low-income in-school youth, ages 14-21, that face barriers to employment.

### **Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T)**

The objective of SNAP is to help low-income households buy the food they need for good health and to provide Employment and Training (E& T) activities.

### **Re-Employment Services and Eligibility Assessment (RESEA)**

The RESEA program is designed to help unemployment insurance claimants return to work faster.

### **Agency Monitoring Cycle**

Monitoring Cycle: October 1, 2019 - September 30, 2020

The Tennessee Department of Labor and Workforce Development will monitor all open contracts with expenditures as of October 1, 2019. Doing so fulfills the requirements under Central Procurement Office Grant Management and Subrecipient Monitoring Policy and Procedures, Policy Number 2013-007. Appendices C-1 and C-2, included within this document, are current as of October 1, 2019.

### **FTE Monitoring Staff**

Please refer to Appendix A on page 18.

## Corrective Action/Monitoring Report Procedure

1. Program Integrity unit and Grants and Budgets Unit staff members update the TDLWD's monitoring guide based on guidelines and requirements from the General Services Monitoring Policy. The monitoring guide will include lists of contracts, fiscal and program questionnaires for all WIOA programs, and a risk assessment chart.
2. The Director of the Program Integrity unit forwards the updated monitoring guide, with a letter, to General Services by October 1 of each year; negotiations will take place until the monitoring guide is formally approved.
3. When the monitoring guide has been approved by General Services then a copy is sent to the Communications Office of TDLWD to be placed on TDLWD's website. Furthermore, a copy is sent to the PAR unit.
4. Program Integrity staff receives a notice from the PAR unit 30 business days prior to a monitoring visit. Program Integrity staff enters the projected date of the review on a monitoring tracking spreadsheet (that is shared between the PAR and Program Integrity units).
5. Before issuing the final results of the monitoring report, the PAR unit forwards the results to the Program Integrity Director. The Program Integrity Director will review and discuss the results with the Grants and Budgets Unit and Workforce Services (WFS) management.
6. A report will be issued by the PAR unit within 30 business days of the completion of the review. Copies of the report will be dispersed to the following parties: the LWDA CLEO, the LWDB Board Chair, the LWDA Fiscal Agent, the Commissioner and Deputy Commissioner of Workforce Learning and Development for the Tennessee Department of Labor and Workforce Development, the Workforce Services Regional Director of the reviewed area, the Local Area Director of the reviewed area, the Assistant Commissioner of Workforce Services, Assistant Administrators of Workforce Services, Program Integrity Director, and the Director of Grants and Budgets. A copy of this report will also be distributed to the State Comptroller of the Treasury.
7. In the event SNAP E&T Grants are monitored, reports will be issued to a staff member at the Department of Human Services (DHS).
8. If there is no finding — and no corrective action is needed — Program Integrity staff enters the date on which the monitoring report is issued, the date on which the monitoring report is received, and the expression of "no findings reported" on the spreadsheet.
9. If there is a finding, the entity monitored will submit the Corrective Action Plan (CAP) within 30 business days after the receipt of the monitoring results. If the CAP submitted by the entity is not accepted, Program Integrity unit will forward a notice — offering technical assistance from the appropriate TDLWD subject matter Unit/staff — to the entity.
  - o The process of thirty (30) business day limits will continue until the entity has corrected the findings.
10. If the CAP does not arrive within 30 business days, or if the CAP is not accepted by Program Integrity unit, a notice will be sent to the entity or technical assistance will be provided by the appropriate TDWLD subject matter Unit/staff.
  - o The process of 30 business day limits will continue until the entity has corrected the findings.
11. If findings are rendered to be significant in terms of failure to perform, or include serious infractions of oversight, or if the local area fails to properly or timely remedy the findings, TDLWD will present the matter to the SWDB under WIOA Section 107(c)(3) as it relates to the LWDB's ability to fulfill their functions.
12. Program Integrity unit will forward the final acceptance to the LWDA CLEO, LWDB Chair, LWDA Executive Director, and Staff to the LWDB.

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## Disclaimer

This guide outlines the steps, procedures, process, and methods utilized by TDLWD in accordance with both state and federal regulations associated with the administration of WIOA funds. In addition to the documents within this guide, TDLWD will utilize internal participant attribute sheets to review individual participant data. The steps, procedures, process, and methods outlined in this

guide will govern the utilization of the review and collection of the data via the participant attribute sheets.

## **Appendices**

### **Total Subrecipient Contracts**

Total subrecipient contracts are demonstrated in Appendix B on page 22, current as of October 1, 2019.

### **Total Subrecipient Contracts Population**

Total subrecipient contracts population is demonstrated in Appendix C-1 on page 23. This appendix is current as of October 1, 2019.

### **Total Subrecipient Contracts to be Monitored**

Total subrecipient contracts to be monitored as demonstrated in Appendix C-2 on page 24. This appendix is current as of October 1, 2019.

### **Subrecipient Risk Assessment**

Please refer to Appendix D on page 25.

### **Explanation of Previous Cycle Monitoring Findings**

Please refer to Appendix E on page 26.

### **Duties and Controls**

Please refer to Appendix F on page 27-31.

### **Program Monitoring Guides**

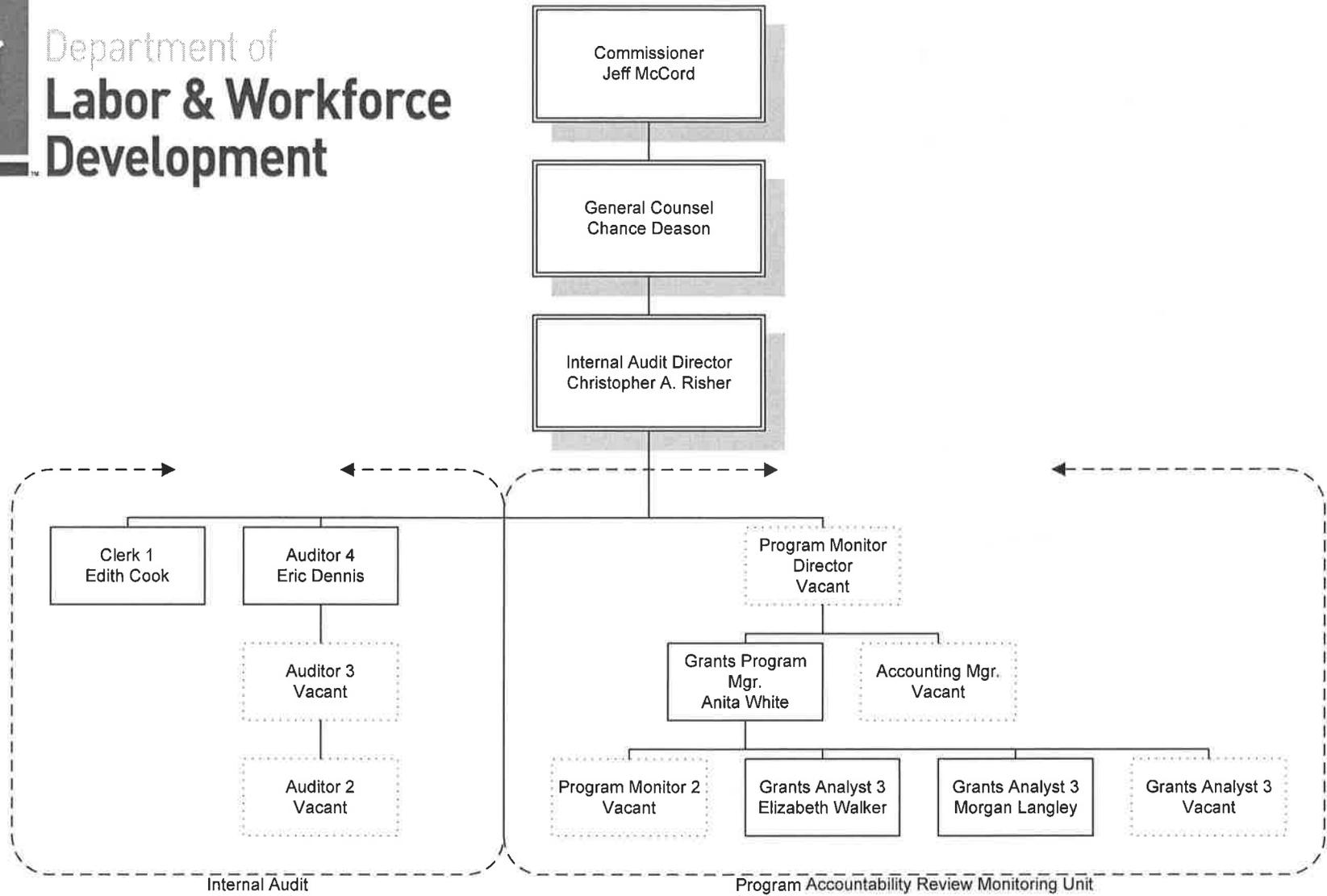
Please refer to Appendix G on page 32-37.

### **Equal Employment Opportunity Questionnaire**

Please refer to Appendix H on page 38-44.

# Internal Audit - Organizational Chart

# APPENDIX A



# APPENDIX B

Subrecipient
Alliance For Business And Training
Center for Employment Opportunities, Inc.
East Tennessee Human Resource Agency Inc
Goodwill Excel Center Midsouth, Inc.
Goodwill Industries - Knoxville, Inc.
Goodwill Industries of Middle Tennessee Inc.
Meritan Inc
Northern Middle Tennessee Local Workforce Development Board, Inc.
Northwest Tennessee Workforce Board
Shelby County Government
South Central Tennessee Development District
Southeast TN Development District
Southwest Human Resource Agency
Tennessee Community Services Agency
The University of Tennessee
United Way of Middle Tennessee, Inc. DBA United Way of Metropolitan Nashville
Upper Cumberland Development District
Upper Cumberland Local Workforce Development Board, Inc.

Total Subrecipient Contracts Population							
Subrecipient	LWDA	Fiscal Year	Contract Type	Contract Number	Project Start Date	Project End Date	Grant Amount
Alliance For Business And Training	LWNE	P19	ADULT	LWNEP191ADULT0	7/1/2019	6/30/2021	\$ 165,446.27
Alliance For Business And Training	LWNE	P19	ADULT	LWNEP191ADULT19	10/1/2018	6/30/2020	\$ 2,093,778.00
Alliance For Business And Training	LWNE	P19	CBSWA	LWNEP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Alliance For Business And Training	LWNE	P19	DSLWK	LWNEP191DSLWK20	7/1/2019	6/30/2021	\$ 169,647.57
Alliance For Business And Training	LWNE	F19	DSLWK	LWNEF191DSLWK19	10/1/2018	6/30/2020	\$ 892,355.00
Alliance For Business And Training	LWNE	P18	MNSWA	LWNEP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Alliance For Business And Training	LWNE	P18	RESEA	LWNEP181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Alliance For Business And Training	LWNE	P19	SCSEP	LWNEP191SCSEP20	7/1/2019	6/30/2020	\$ 209,192.99
Alliance For Business And Training	LWNE	P19	YOUTH	LWNEP191YOUTH20	4/1/2019	6/30/2021	\$ 1,048,136.11
Alliance For Business And Training	LWNE	P18	YOUTH	LWNEP181YOUTH19	7/1/2018	6/30/2020	\$ 1,119,145.51
Center for Employment Opportunities, Inc.	LW22	F19	SSNAP	LW22F191SSNAP19	10/1/2018	9/30/2019	\$ 226,525.00
East Tennessee Human Resource Agency Inc	LWET	P19	ADULT	LWETP191ADULT20	7/1/2019	6/30/2021	\$ 332,180.92
East Tennessee Human Resource Agency Inc	LWET	P18	ADULT	LWETP181ADULT19	7/1/2018	6/30/2020	\$ 412,738.00
East Tennessee Human Resource Agency Inc	LWET	F19	ADULT	LWETF191ADULT19	10/1/2018	6/30/2020	\$ 2,200,347.00
East Tennessee Human Resource Agency Inc	LWET	P17	CBSWA	LWETP171CBSWA18	10/1/2018	9/30/2019	\$ 500,000.00
East Tennessee Human Resource Agency Inc	LWET	F18	CBSWA	LWETF181CBSWA18	10/1/2018	9/30/2019	\$ 27,778.00
East Tennessee Human Resource Agency Inc	LWET	P19	DSLWK	LWETP191DSLWK20	7/1/2019	6/30/2021	\$ 395,304.26
East Tennessee Human Resource Agency Inc	LWET	P18	DSLWK	LWETP181DSLWK19	7/1/2018	6/30/2020	\$ 428,943.00
East Tennessee Human Resource Agency Inc	LWET	F19	DSLWK	LWETF191DSLWK19	10/1/2018	6/30/2020	\$ 2,039,651.00
East Tennessee Human Resource Agency Inc	LWET	P18	MNSWA	LWETP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
East Tennessee Human Resource Agency Inc	LWET	P18	RESEA	LWETP181RESEA19	10/1/2018	9/30/2019	\$ 78,000.00
East Tennessee Human Resource Agency Inc	LWET	P19	YOUTH	LWETP191YOUTH20	4/1/2019	6/30/2021	\$ 2,141,712.57
East Tennessee Human Resource Agency Inc	LWET	P18	YOUTH	LWETP181YOUTH19	7/1/2018	6/30/2020	\$ 2,358,572.70
Goodwill Excel Center Midsouth, Inc.	LW23	F19	SSNAP	LW23F191SSNAP19	7/1/2019	9/30/2019	\$ 134,776.50
Goodwill Industries - Knoxville, Inc.	LW14	F19	SSNAP	LW14F191SSNAP19	10/1/2018	9/30/2019	\$ 105,183.00
Goodwill Industries of Middle Tennessee, Inc.	LW15	F19	SSNAP	LW15F191SSNAP19	11/1/2018	9/30/2019	\$ 58,663.00
Meritan Inc	LW19	P19	SCSEP	LW19P191SCSEP20	7/1/2019	6/30/2020	\$ 209,192.99
Meritan Inc	LW19	P18	SCSEP	LW19P181SCSEP19	7/1/2018	6/30/2019	\$ 413,291.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P19	ADULT	LWNMP191ADULT20	7/1/2019	6/30/2021	\$ 348,584.54
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	ADULT	LWNMP181ADULT19	7/1/2018	6/30/2020	\$ 423,958.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	F19	ADULT	LWNMF191ADULT19	10/1/2018	6/30/2020	\$ 2,260,157.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	CBSWA	LWNMP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P19	DSLWK	LWNMP191DSLWK20	7/1/2019	6/30/2021	\$ 592,840.29
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	DSLWK	LWNMP181DSLWK19	7/1/2018	6/30/2020	\$ 591,689.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	F19	DSLWK	LWNMF191DSLWK19	10/1/2018	6/30/2020	\$ 2,813,518.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	MNSWA	LWNMP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	RESEA	LWNMP181RESEA19	10/1/2018	9/30/2019	\$ 156,000.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	SESWA	LWNMP181SESWA19	2/1/2019	1/31/2020	\$ 255,080.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	F19	TEDWG	LWNMF191TEDWG19	10/1/2018	9/30/2019	\$ 3,100,019.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P19	YOUTH	LWNMP191YOUTH20	4/1/2019	6/30/2021	\$ 2,344,578.41
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNM	P18	YOUTH	LWNMP181YOUTH19	7/1/2018	6/30/2020	\$ 2,528,487.93
Northwest Tennessee Workforce Board	LWNW	P19	ADULT	LWNWP191ADULT20	7/1/2019	6/30/2021	\$ 115,694.63
Northwest Tennessee Workforce Board	LWNW	P18	ADULT	LWNWP181ADULT19	7/1/2018	6/30/2020	\$ 122,183.00
Northwest Tennessee Workforce Board	LWNW	F19	ADULT	LWNWF191ADULT19	10/1/2018	6/30/2020	\$ 651,364.00
Northwest Tennessee Workforce Board	LWNW	P18	CBSWA	LWNWP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Northwest Tennessee Workforce Board	LWNW	P19	DSLWK	LWNWP191DSLWK20	7/1/2019	6/30/2021	\$ 107,591.84
Northwest Tennessee Workforce Board	LWNW	P18	DSLWK	LWNWP181DSLWK19	7/1/2018	6/30/2020	\$ 117,132.00
Northwest Tennessee Workforce Board	LWNW	F19	DSLWK	LWNWF191DSLWK19	10/1/2018	6/30/2020	\$ 556,972.00
Northwest Tennessee Workforce Board	LWNW	P18	MNSWA	LWNWP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Northwest Tennessee Workforce Board	LWNW	P18	RESEA	LWNWP181RESEA19	10/1/2018	9/30/2019	\$ 86,866.00
Northwest Tennessee Workforce Board	LWNW	P19	YOUTH	LWNWP191YOUTH20	4/1/2019	6/30/2021	\$ 725,200.88
Northwest Tennessee Workforce Board	LWNW	P18	YOUTH	LWNWP181YOUTH19	7/1/2018	6/30/2020	\$ 683,441.50
Shelby County Government	LWGM	P18	ADULT	LWGMF181ADULT19	7/1/2018	6/30/2020	\$ 502,638.00
Shelby County Government	LWGM	F19	ADULT	LWGMF191ADULT19	10/1/2018	6/30/2020	\$ 2,679,626.00
Shelby County Government	LWGM	F19	CBSWA	LWGMF191CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Shelby County Government	LWGM	P18	DSLWK	LWGMF181DSLWK19	7/1/2018	6/30/2020	\$ 523,667.00
Shelby County Government	LWGM	F19	DSLWK	LWGMF191DSLWK19	10/1/2018	6/30/2020	\$ 2,490,075.00
Shelby County Government	LWGM	P18	MNSWA	LWGMF181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Shelby County Government	LWGM	F18	MNSWA	LWGMF182MNSWA18	11/15/2018	6/30/2020	\$ 146,542.00
Shelby County Government	LWGM	P18	RESEA	LWGMF181RESEA19	10/1/2018	9/30/2019	\$ 78,000.00
Shelby County Government	LWGM	F19	SERSP	LWGMF191SERSP19	11/15/2018	6/30/2020	\$ 614,000.00
Shelby County Government	LWGM	F18	SESWA	LWGMF181SESWA18	11/15/2018	6/30/2020	\$ 618,881.00
Shelby County Government	LWGM	P19	YOUTH	LWGMF191YOUTH20	4/1/2019	6/30/2021	\$ 3,307,017.00
Shelby County Government	LWGM	P18	YOUTH	LWGMF181YOUTH19	7/1/2018	6/30/2020	\$ 3,015,687.92
South Central Tennessee Development District	LWSM	P19	ADULT	LWSMP191ADULT20	7/1/2019	6/30/2021	\$ 109,997.72
South Central Tennessee Development District	LWSM	P18	ADULT	LWSMP181ADULT19	7/1/2018	6/30/2020	\$ 133,953.00
South Central Tennessee Development District	LWSM	F19	ADULT	LWSMF191ADULT19	10/1/2018	6/30/2020	\$ 714,109.00
South Central Tennessee Development District	LWSM	F18	CBSWA	LWSMF181CBSWA18	10/1/2018	9/30/2019	\$ 221,778.00
South Central Tennessee Development District	LWSM	P17	CBSWA	LWSMP171CBSWA18	10/1/2018	9/30/2019	\$ 300,000.00
South Central Tennessee Development District	LWSM	P19	DSLWK	LWSMP191DSLWK20	7/1/2019	6/30/2021	\$ 149,404.66
South Central Tennessee Development District	LWSM	P18	DSLWK	LWSMP181DSLWK19	7/1/2018	6/30/2020	\$ 154,760.00
South Central Tennessee Development District	LWSM	F19	DSLWK	LWSMF191DSLWK19	10/1/2018	6/30/2020	\$ 735,891.00
South Central Tennessee Development District	LWSM	P18	MNSWA	LWSMP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
South Central Tennessee Development District	LWSM	P18	RESEA	LWSMP181RESEA19	10/1/2018	9/30/2019	\$ 26,000.00
South Central Tennessee Development District	LWSM	P19	YOUTH	LWSMP191YOUTH20	4/1/2019	6/30/2021	\$ 694,783.80
South Central Tennessee Development District	LWSM	P18	YOUTH	LWSMP181YOUTH19	7/1/2018	6/30/2020	\$ 749,553.37
Southeast TN Development District	LWSE	P19	ADULT	LWSEF191ADULT20	7/1/2019	6/30/2021	\$ 223,301.19
Southeast TN Development District	LWSE	P18	ADULT	LWSEF181ADULT19	7/1/2018	6/30/2020	\$ 237,327.00
Southeast TN Development District	LWSE	F19	ADULT	LWSEF191ADULT19	10/1/2018	6/30/2020	\$ 1,265,214.00
Southeast TN Development District	LWSE	F18	CBSWA	LWSEF181CBSWA18	10/1/2018	9/30/2019	\$ 187,778.00
Southeast TN Development District	LWSE	P17	CBSWA	LWSEF171CBSWA18	10/1/2018	9/30/2019	\$ 160,000.00
Southeast TN Development District	LWSE	P17	CBSWA	LWSEF172CBSWA18	10/1/2018	9/30/2019	\$ 180,000.00
Southeast TN Development District	LWSE	P19	DSLWK	LWSEF191DSLWK20	7/1/2019	6/30/2021	\$ 234,010.77
Southeast TN Development District	LWSE	P18	DSLWK	LWSEF181DSLWK19	7/1/2018	6/30/2020	\$ 264,651.00
Southeast TN Development District	LWSE	F19	DSLWK	LWSEF191DSLWK19	10/1/2018	6/30/2020	\$ 1,258,429.00
Southeast TN Development District	LWSE	P18	MNSWA	LWSEF181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Southeast TN Development District	LWSE	P18	RESEA	LWSEF181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Southeast TN Development District	LWSE	P19	YOUTH	LWSEF191YOUTH20	4/1/2019	6/30/2021	\$ 1,393,553.00
Southeast TN Development District	LWSE	P18	YOUTH	LWSEF181YOUTH19	7/1/2018	6/30/2020	\$ 1,369,020.02
Southwest Human Resource Agency	LWSW	P19	ADULT	LWSWP191ADULT20	7/1/2019	6/30/2021	\$ 122,070.31
Southwest Human Resource Agency	LWSW	P18	ADULT	LWSWP181ADULT19	7/1/2018	6/30/2020	\$ 121,185.00
Southwest Human Resource Agency	LWSW	F19	ADULT	LWSWF191ADULT19	10/1/2018	6/30/2020	\$ 646,046.00
Southwest Human Resource Agency	LWSW	F19	CBSWA	LWSWF191CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Southwest Human Resource Agency	LWSW	P19	DSLWK	LWSWP191DSLWK20	7/1/2019	6/30/2021	\$ 103,429.71
Southwest Human Resource Agency	LWSW	P18	DSLWK	LWSWP181DSLWK19	7/1/2018	6/30/2020	\$ 115,999.00
Southwest Human Resource Agency	LWSW	F19	DSLWK	LWSWF191DSLWK19	10/1/2018	6/30/2020	\$ 551,580.00
Southwest Human Resource Agency	LWSW	P18	MNSWA	LWSWP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Southwest Human Resource Agency	LWSW	P18	RESEA	LWSWP181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Southwest Human Resource Agency	LWSW	P19	YOUTH	LWSWP191YOUTH20	4/1/2019	6/30/2021	\$ 765,917.91
Southwest Human Resource Agency	LWSW	P18	YOUTH	LWSWP181YOUTH19	7/1/2018	6/30/2020	\$ 669,049.69
Tennessee Community Services Agency	LW20	P19	SCSEP	LW20P191SCSEP20	7/1/2019	6/30/2020	\$ 254,669.72
The University of Tennessee	LW21	F19	OSNAP	LW21F191OSNAP19	10/1/2018	9/30/2019	\$ 189,866.00
The University of Tennessee	LW21	F19	SSNAP	LW21F191SSNAP19	10/1/2018	9/30/2019	\$ 466,556.00
United Way of Middle Tennessee, Inc. DBA United Way of Metropolitan Nashville	LW24	F19	SSNAP	LW24F191SSNAP19	7/1/2019	9/30/2019	\$ 212,458.00
Upper Cumberland Development District	LWUC	F19	DSLWK	LWUCF191DSLWK19	10/1/2018	6/30/2020	\$ 234,748.01
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	F19	ADULT	LWUCF192ADULT19	5/15/2019	6/30/2020	\$ 5,579.85
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	ADULT	LWUCP191ADULT20	7/1/2019	6/30/2021	\$ 109,091.48
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	CBSWA	LWUCP182CBSWA19	5/15/2019	9/30/2019	\$ 412,021.44
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	F19	DSLWK	LWUCF192DSLWK19	5/25/2019	6/30/2020	\$ 306,431.99
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	DSLWK	LWUCP191DSLWK20	7/1/2019	6/30/2021	\$ 111,895.75
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	MNSWA	LWUCP182MNSWA19	5/15/2019	9/30/2019	\$ 3,207.11
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P17	MNSWA	LWUCP172MNSWA18	6/10/2019	7/31/2019	\$ 36,898.24
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	RESEA	LWUCP182RESEA19	5/15/2019	9/30/2019	\$ 56,079.73
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	SCSEP	LWUCP191SCSEP20	7/1/2019	6/30/2020	\$ 181,906.95
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	YOUTH	LWUCP192YOUTH20	4/1/2019	6/30/2021</	

# APPENDIX C-2

## Total Subrecipient Contracts to be Monitored

Subrecipient	LWDA	Fiscal Year	Contract Type	Contract Number	Project Start Date	Project End Date	Grant Amount
Alliance For Business And Training	LWNE	P19	ADULT	LWNEP19ADULT20	7/1/2019	6/30/2021	\$ 166,446.27
Alliance For Business And Training	LWNE	F19	ADULT	LWNEP19ADULT19	10/1/2018	6/30/2020	\$ 1,093,578.00
Alliance For Business And Training	LWNE	P18	CBSWA	LWNEP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Alliance For Business And Training	LWNE	P19	DSLWK	LWNEP19DSLWK20	7/1/2019	6/30/2021	\$ 169,647.57
Alliance For Business And Training	LWNE	F19	DSLWK	LWNEP19DSLWK19	10/1/2018	6/30/2020	\$ 892,355.00
Alliance For Business And Training	LWNE	P18	MNSWA	LWNEP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Alliance For Business And Training	LWNE	P18	RESEA	LWNEP181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Alliance For Business And Training	LWNE	P19	SCSEP	LWNEP191SCSEP20	7/1/2019	6/30/2020	\$ 209,192.99
Alliance For Business And Training	LWNE	P19	YOUTH	LWNEP191YOUTH20	4/1/2019	6/30/2021	\$ 1,048,136.11
Alliance For Business And Training	LWNE	P18	YOUTH	LWNEP181YOUTH19	7/1/2018	6/30/2020	\$ 1,119,145.51
Center for Employment Opportunities, Inc.	LW22	F19	SSNAP	LW22F19SSNAP19	10/1/2018	9/30/2019	\$ 226,525.00
East Tennessee Human Resource Agency Inc	LWET	P19	ADULT	LWETP19ADULT20	7/1/2019	6/30/2021	\$ 332,180.92
East Tennessee Human Resource Agency Inc	LWET	P18	ADULT	LWETP18ADULT19	7/1/2018	6/30/2020	\$ 412,738.00
East Tennessee Human Resource Agency Inc	LWET	F19	ADULT	LWETP19ADULT19	10/1/2018	6/30/2020	\$ 2,200,347.00
East Tennessee Human Resource Agency Inc	LWET	P17	CBSWA	LWETP171CBSWA18	10/1/2018	9/30/2019	\$ 500,000.00
East Tennessee Human Resource Agency Inc	LWET	F18	CBSWA	LWETP181CBSWA18	10/1/2018	9/30/2019	\$ 27,778.00
East Tennessee Human Resource Agency Inc	LWET	P19	DSLWK	LWETP19DSLWK20	7/1/2019	6/30/2021	\$ 395,304.26
East Tennessee Human Resource Agency Inc	LWET	P18	DSLWK	LWETP18DSLWK19	7/1/2018	6/30/2020	\$ 428,943.00
East Tennessee Human Resource Agency Inc	LWET	F19	DSLWK	LWETP19DSLWK19	10/1/2018	6/30/2020	\$ 2,039,651.00
East Tennessee Human Resource Agency Inc	LWET	P18	MNSWA	LWETP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
East Tennessee Human Resource Agency Inc	LWET	P18	RESEA	LWETP181RESEA19	10/1/2018	9/30/2019	\$ 78,000.00
East Tennessee Human Resource Agency Inc	LWET	P19	YOUTH	LWETP191YOUTH20	4/1/2019	6/30/2021	\$ 2,141,712.57
East Tennessee Human Resource Agency Inc	LWET	P18	YOUTH	LWETP181YOUTH19	7/1/2018	6/30/2020	\$ 2,358,572.70
Goodwill Excel Center Midsouth, Inc.	LW23	F19	SSNAP	LW23F19SSNAP19	7/1/2019	9/30/2019	\$ 134,776.50
Goodwill Industries of Middle Tennessee Inc.	LW15	F19	SSNAP	LW15F19SSNAP19	11/1/2018	9/30/2019	\$ 58,663.00
Meritan Inc	LW19	P19	SCSEP	LW19P191SCSEP20	7/1/2019	6/30/2020	\$ 209,192.99
Meritan Inc	LW19	P18	SCSEP	LW19P181SCSEP19	7/1/2018	6/30/2019	\$ 413,291.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P19	ADULT	LWNNP19ADULT20	7/1/2019	6/30/2021	\$ 348,584.54
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	ADULT	LWNNP18ADULT19	7/1/2018	6/30/2020	\$ 423,958.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	F19	ADULT	LWNNP19ADULT19	10/1/2018	6/30/2020	\$ 2,260,157.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	CBSWA	LWNNP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P19	DSLWK	LWNNP19DSLWK20	7/1/2019	6/30/2021	\$ 592,840.29
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	DSLWK	LWNNP18DSLWK19	7/1/2018	6/30/2020	\$ 591,689.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	F19	DSLWK	LWNNP19DSLWK19	10/1/2018	6/30/2020	\$ 2,813,518.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	MNSWA	LWNNP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	RESEA	LWNNP181RESEA19	10/1/2018	9/30/2019	\$ 156,000.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	SESWA	LWNNP181SESWA19	2/1/2019	1/31/2020	\$ 255,080.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	F19	TEDWG	LWNNP191TEDWG19	10/1/2018	9/30/2019	\$ 3,100,019.00
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P19	YOUTH	LWNNP191YOUTH20	4/1/2019	6/30/2021	\$ 2,344,578.41
Northern Middle Tennessee Local Workforce Development Board, Inc.	LWNN	P18	YOUTH	LWNNP181YOUTH19	7/1/2018	6/30/2020	\$ 2,528,487.93
Northwest Tennessee Workforce Board	LWNW	P19	ADULT	LWNWP19ADULT20	7/1/2019	6/30/2021	\$ 115,694.63
Northwest Tennessee Workforce Board	LWNW	P18	ADULT	LWNWP18ADULT19	7/1/2018	6/30/2020	\$ 122,183.00
Northwest Tennessee Workforce Board	LWNW	F19	ADULT	LWNWP19ADULT19	10/1/2018	6/30/2020	\$ 651,364.00
Northwest Tennessee Workforce Board	LWNW	P18	CBSWA	LWNWP181CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Northwest Tennessee Workforce Board	LWNW	P19	DSLWK	LWNWP19DSLWK20	7/1/2019	6/30/2021	\$ 107,591.84
Northwest Tennessee Workforce Board	LWNW	P18	DSLWK	LWNWP18DSLWK19	7/1/2018	6/30/2020	\$ 117,132.00
Northwest Tennessee Workforce Board	LWNW	F19	DSLWK	LWNWP19DSLWK19	10/1/2018	6/30/2020	\$ 556,972.00
Northwest Tennessee Workforce Board	LWNW	P18	MNSWA	LWNWP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Northwest Tennessee Workforce Board	LWNW	P18	RESEA	LWNWP181RESEA19	10/1/2018	9/30/2019	\$ 86,666.00
Northwest Tennessee Workforce Board	LWNW	P19	YOUTH	LWNWP191YOUTH20	4/1/2019	6/30/2021	\$ 725,200.88
Northwest Tennessee Workforce Board	LWNW	P18	YOUTH	LWNWP181YOUTH19	7/1/2018	6/30/2020	\$ 683,441.50
Shelby County Government	LWGM	P18	ADULT	LWGMF18ADULT19	7/1/2018	6/30/2020	\$ 502,638.00
Shelby County Government	LWGM	F19	ADULT	LWGMF19ADULT19	10/1/2018	6/30/2020	\$ 2,679,626.00
Shelby County Government	LWGM	F19	CBSWA	LWGMF191CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Shelby County Government	LWGM	P18	DSLWK	LWGMF18DSLWK19	7/1/2018	6/30/2020	\$ 523,667.00
Shelby County Government	LWGM	F19	DSLWK	LWGMF19DSLWK19	10/1/2018	6/30/2020	\$ 2,490,075.00
Shelby County Government	LWGM	P18	MNSWA	LWGMF181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Shelby County Government	LWGM	F18	MNSWA	LWGMF182MNSWA18	11/15/2018	6/30/2020	\$ 146,542.00
Shelby County Government	LWGM	P18	RESEA	LWGMF181RESEA19	10/1/2018	9/30/2019	\$ 78,000.00
Shelby County Government	LWGM	F19	SERP	LWGMF191SERP19	11/15/2018	6/30/2020	\$ 614,000.00
Shelby County Government	LWGM	F18	SESWA	LWGMF181SESWA18	11/15/2018	6/30/2020	\$ 618,881.00
Shelby County Government	LWGM	P19	YOUTH	LWGMF191YOUTH20	4/1/2019	6/30/2021	\$ 3,307,017.00
Shelby County Government	LWGM	P18	YOUTH	LWGMF181YOUTH19	7/1/2018	6/30/2020	\$ 3,015,687.92
South Central Tennessee Development District	LWSM	P19	ADULT	LWSMP19ADULT20	7/1/2019	6/30/2021	\$ 109,997.72
South Central Tennessee Development District	LWSM	P18	ADULT	LWSMP18ADULT19	7/1/2018	6/30/2020	\$ 133,953.00
South Central Tennessee Development District	LWSM	F19	ADULT	LWSMP19ADULT19	10/1/2018	6/30/2020	\$ 714,109.00
South Central Tennessee Development District	LWSM	F18	CBSWA	LWSMF181CBSWA18	10/1/2018	9/30/2019	\$ 227,778.00
South Central Tennessee Development District	LWSM	P17	CBSWA	LWSMP171CBSWA18	10/1/2018	9/30/2019	\$ 300,000.00
South Central Tennessee Development District	LWSM	P19	DSLWK	LWSMP19DSLWK20	7/1/2019	6/30/2021	\$ 149,404.66
South Central Tennessee Development District	LWSM	P18	DSLWK	LWSMP18DSLWK19	7/1/2018	6/30/2020	\$ 154,760.00
South Central Tennessee Development District	LWSM	F19	DSLWK	LWSMP19DSLWK19	10/1/2018	6/30/2020	\$ 735,891.00
South Central Tennessee Development District	LWSM	P18	MNSWA	LWSMP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
South Central Tennessee Development District	LWSM	P18	RESEA	LWSMP181RESEA19	10/1/2018	9/30/2019	\$ 26,000.00
South Central Tennessee Development District	LWSM	P19	YOUTH	LWSMP191YOUTH20	4/1/2019	6/30/2021	\$ 694,783.80
South Central Tennessee Development District	LWSM	P18	YOUTH	LWSMP181YOUTH19	7/1/2018	6/30/2020	\$ 749,553.37
Southeast TN Development District	LWSE	P19	ADULT	LWSEP19ADULT20	7/1/2019	6/30/2021	\$ 223,301.19
Southeast TN Development District	LWSE	P18	ADULT	LWSEP18ADULT19	7/1/2018	6/30/2020	\$ 237,327.00
Southeast TN Development District	LWSE	F19	ADULT	LWSEP19ADULT19	10/1/2018	6/30/2020	\$ 1,265,714.00
Southeast TN Development District	LWSE	F18	CBSWA	LWSEP181CBSWA18	10/1/2018	9/30/2019	\$ 187,778.00
Southeast TN Development District	LWSE	P17	CBSWA	LWSEP171CBSWA18	10/1/2018	9/30/2019	\$ 160,000.00
Southeast TN Development District	LWSE	P17	CBSWA	LWSEP172CBSWA18	10/1/2018	9/30/2019	\$ 180,000.00
Southeast TN Development District	LWSE	P19	DSLWK	LWSEP19DSLWK20	7/1/2019	6/30/2021	\$ 234,010.77
Southeast TN Development District	LWSE	P18	DSLWK	LWSEP18DSLWK19	7/1/2018	6/30/2020	\$ 264,651.00
Southeast TN Development District	LWSE	F19	DSLWK	LWSEP19DSLWK19	10/1/2018	6/30/2020	\$ 1,258,429.00
Southeast TN Development District	LWSE	P18	MNSWA	LWSEP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Southeast TN Development District	LWSE	P18	RESEA	LWSEP181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Southeast TN Development District	LWSE	P19	YOUTH	LWSEP191YOUTH20	4/1/2019	6/30/2021	\$ 1,393,553.00
Southeast TN Development District	LWSE	P18	YOUTH	LWSEP181YOUTH19	7/1/2018	6/30/2020	\$ 1,369,020.02
Southwest Human Resource Agency	LWSW	P19	ADULT	LWSWP19ADULT20	7/1/2019	6/30/2021	\$ 122,070.31
Southwest Human Resource Agency	LWSW	P18	ADULT	LWSWP18ADULT19	7/1/2018	6/30/2020	\$ 121,185.00
Southwest Human Resource Agency	LWSW	F19	ADULT	LWSWP19ADULT19	10/1/2018	6/30/2020	\$ 646,046.00
Southwest Human Resource Agency	LWSW	F19	CBSWA	LWSWF191CBSWA19	10/1/2018	9/30/2019	\$ 527,778.00
Southwest Human Resource Agency	LWSW	P19	DSLWK	LWSWP19DSLWK20	7/1/2019	6/30/2021	\$ 103,429.71
Southwest Human Resource Agency	LWSW	P18	DSLWK	LWSWP18DSLWK19	7/1/2018	6/30/2020	\$ 115,999.00
Southwest Human Resource Agency	LWSW	F19	DSLWK	LWSWF19DSLWK19	10/1/2018	6/30/2020	\$ 551,580.00
Southwest Human Resource Agency	LWSW	P18	MNSWA	LWSWP181MNSWA19	10/1/2018	9/30/2019	\$ 27,777.00
Southwest Human Resource Agency	LWSW	P18	RESEA	LWSWP181RESEA19	10/1/2018	9/30/2019	\$ 52,000.00
Southwest Human Resource Agency	LWSW	P19	YOUTH	LWSWP191YOUTH20	4/1/2019	6/30/2021	\$ 765,917.91
Southwest Human Resource Agency	LWSW	P18	YOUTH	LWSWP181YOUTH19	7/1/2018	6/30/2020	\$ 669,049.69
The University of Tennessee	LW21	F19	QSNAP	LW21F19QSNAP19	10/1/2018	9/30/2019	\$ 189,866.00
The University of Tennessee	LW21	F19	SSNAP	LW21F19SSNAP19	10/1/2018	9/30/2019	\$ 466,556.00
United Way of Middle Tennessee, Inc. DBA United Way of Metropolitan Nashville	LW24	F19	SSNAP	LW24F19SSNAP19	7/1/2019	9/30/2019	\$ 212,458.00
Upper Cumberland Development District	LWUC	F19	DSLWK	LWUCF19DSLWK19	10/1/2018	6/30/2020	\$ 234,748.01
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	F19	ADULT	LWUCF19ADULT19	5/15/2019	6/30/2020	\$ 5,579.85
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	ADULT	LWUCP19ADULT20	7/1/2019	6/30/2021	\$ 109,091.48
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	CBSWA	LWUCP182CBSWA19	5/15/2019	9/30/2019	\$ 412,021.44
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	F19	DSLWK	LWUCF19DSLWK19	5/25/2019	6/30/2020	\$ 306,431.99
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	DSLWK	LWUCP19DSLWK20	7/1/2019	6/30/2021	\$ 111,895.75
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	MNSWA	LWUCP182MNSWA19	5/15/2019	9/30/2019	\$ 3,207.11
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P17	MNSWA	LWUCP172MNSWA18	6/10/2019	7/31/2019	\$ 36,898.24
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	RESEA	LWUCP182RESEA19	5/15/2019	9/30/2019	\$ 56,079.73
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	SCSEP	LWUCP191SCSEP20	7/1/2019	6/30/2020	\$ 181,906.95
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P19	YOUTH	LWUCP192YOUTH20	4/1/2019	6/30/2021	\$ 526,164.26
Upper Cumberland Local Workforce Development Board, Inc.	LWUC	P18	YOUTH	LWUCP182YOUTH19	5/15/2019	6/30/2020	\$ 26,770.97

# APPENDIX D

	Federal Regulation	Complexity*	Prior Experience*	Last Time Monitored	Level of Risk*	Notes
Northeast	WIOA Section 184(a)(4)	3	3	4/29/2019	3	
East	WIOA Section 184(a)(4)	3	3	7/15/2019	3	
Southeast	WIOA Section 184(a)(4)	3	3	2/25/2019	3	<b>Identified as 'high risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Monitoring these subrecipients is required under federal law</li> <li>Entities are comprised of multiple programs of high complexity</li> <li>Each entity demonstrated findings during previous monitoring cycles and the majority demonstrated multiple findings.</li> </ul>
Upper Cumberland	WIOA Section 184(a)(4)	3	3	3/25/2019	3	
Northern Middle	WIOA Section 184(a)(4)	3	3	5/13/2019	3	
Southern Middle	WIOA Section 184(a)(4)	3	3	6/18/2019	3	
Northwest	WIOA Section 184(a)(4)	3	3	2/11/2019	3	
Southwest	WIOA Section 184(a)(4)	3	3	8/5/2019	3	
Greater Memphis	WIOA Section 184(a)(4)	3	3	8/26/2019	3	
TN CSA	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	2	2	3/7/2019	1	
Meritan	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	2	2	4/12/2019	3	<b>Identified as 'high risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>2017-2018 monitoring cycle: two findings identified, but one related to 65% financial reports reflecting late submission</li> <li>2018-2019 monitoring cycle: two findings reflecting questioned costs and out of period expenditures</li> </ul>
Goodwill Middle TN	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	3	1	9/12/2017	3	<b>Identified as 'high risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Not monitored during 2017-2018 cycle</li> <li>2018-2019 monitoring cycle: findings reflecting that subrecipient has not entered participant data into Jobs4TN, as required in the service provision contract</li> </ul>
Goodwill Knoxville TN	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	2	2	8/1/2019	1	<b>Will not be monitored during the 2019-2020 cycle:</b> <ul style="list-style-type: none"> <li>No findings recorded during the 2017-2018 monitoring cycle</li> <li>One finding recorded during the 2018-2019 monitoring cycle: subrecipient did not report matching expenditures on the correct line in either the monthly financial status reports or the close-out report</li> </ul>
Center for Employment Opportunities	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	3	2	Has not been monitored previously	3	<b>Identified as 'high risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Subrecipient has not been previously monitored</li> </ul>
Goodwill Excel Center Mid-South	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	3	2	Has not been monitored previously	3	<b>Identified as 'high risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Subrecipient has not been previously monitored</li> </ul>
University of TN - Extension	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	1	3	9/5/2019	2	<b>Identified as 'medium risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Not monitored during 2017-2018 cycle</li> <li>Findings during the 2018-2019 monitoring cycle indicated that approximately 45% of financial reports have been submitted late</li> </ul>
United Way of Middle TN	Central Procurement Office Grant Management and Subrecipient Monitoring Policy and ProceduresSection 9.1	2	2	Has not been monitored previously	2	<b>Identified as 'medium risk' for the following reasons:</b> <ul style="list-style-type: none"> <li>Subrecipient has not been previously monitored</li> </ul>

\* Complexity, Prior Experience, and Level of Risk are rated on a 1-3 scale of Professional Judgement  
 A score of '1' indicates 'Low' and '3' indicates 'High'

# APPENDIX E

2018-19 Monitoring Cycle		Report Issued	Subrecipient Response	TDLWD Response	Subrecipient Response	TDLWD Response	Subrecipient Response	TDLWD Response	Subrecipient Response	Final TDLWD Response	CAP Accepted?
Northeast	<b>Alliance for Business and Training, Inc.</b>	6/17/2019	7/11/2019	7/18/2019	8/26/2019	10/8/2019					No
	<ul style="list-style-type: none"> <li>One specific issue needs improvement.</li> <li>Incumbent workers are not always entered into Jobs4TN: Staff to the Northeast TN LWDB did not always enter incumbent worker information into Jobs4TN. The monitors noted some incumbent worker information in Jobs4TN, but not all of the incumbent worker information was entered: create participant applications, record provided services, upload supportive documentation to verify eligibility, provide case notes regarding interactions with participants.</li> <li>Questioned costs were charged to grants: (a) A youth participant's uniform was charged to an adult grant (LWNEF191ADULT19) in the fiscal agent's accounting system in the amount of \$209.80. However, Jobs4TN shows that the uniform was funded in the youth grant. (b) One hundred (100) umbrellas costing \$1,219.34 were purchased and charged to grant LWNEP171TFSWA18.</li> <li>Two vehicles need to be added to the inventory listing: As part of the re-alignment, LWDA 2 transferred two vehicles to AB&amp;T. These vehicles were purchased with federal grant funds, are already tagged, and should be on AB&amp;T's inventory listing. A revised equipment listing including the two vehicles has been provided to the monitors.</li> </ul>										
East	<b>East Tennessee Human Resource Agency</b>	8/20/2019	9/20/2019	11/4/2019							No
	<ul style="list-style-type: none"> <li>One specific issue needs improvement.</li> <li>Incumbent workers are not always entered into Jobs4TN: Staff to the East TN LWDB did not always enter incumbent worker information into Jobs4TN. The monitors noted some incumbent worker information had been entered in Jobs4TN since October 2018, but not all of the incumbent worker information was entered prior to the realignment of local areas.</li> <li>Out-of-period expenditures were charged to LWET181ADULT18 that had a beginning date of November 15, 2018, resulting in questioned costs of \$1,070.62.</li> <li>Case management needs improvement: Overall, this review noted issues with case management, case notes, and some missing documentation.</li> <li>Out-of-period expenditures were charged to grants, resulting in questioned costs of \$13,216.35. It appears these discrepancies were a result of expenditures being moved from one grant to another (see PAR Report for further information, including contract numbers and questioned costs attributed to the respective contract).</li> <li>Questioned costs were charged to a grant agreement: sales tax of \$2.01 was reimbursed to an employee for supplies purchased and charged to LW05F181DSLWK18.</li> <li>One specific issue needs improvement.</li> </ul>										
Southeast	<b>Southeast Tennessee Development District</b>	7/23/2019	8/16/2019	9/9/2019	10/22/2019						No
	<ul style="list-style-type: none"> <li>Case management needs improvement: participant applications, documentation for provided services, upload of supportive documentation to verify eligibility, provide case notes regarding interactions with participants.</li> <li>Property inventory system needs improvement: (a) inventory listing contains entries that were not purchased with grant funds received from TDLWD. (b) Property inventory contains items that are not required to be listed. (c) The property inventory listing should show the actual purchase price of the piece of equipment. Staff to the board requested to purchase two laptops which included documentation on the sales price. When these laptops were added to the inventory listing, the original sales price was used, as opposed to the actual cost of the laptops. As a result we question \$181.62 (e.g. \$2,090.80 - \$1,909.99 per laptop), which is the amount over the approved purchase amount. (d) Some equipment items are shown as missing, but the monitors were provided documentation indicating that the equipment items were surplus. The inventory listing should be updated to reflect that these pieces of equipment were actually surplus, as opposed to missing. (e) Date of surplus is missing on inventory listing.</li> <li>Out of period expenditures were charged to grants, resulting in questioned costs of \$1,114.60. Charges in the amount of \$758.62 were allocated to grant LW07P173MNSWA17. Also, charges in the amount of \$355.98 were allocated to grant LW07F174MNSWA17. As a result of this error, we question costs of \$1,114.60 (e.g. \$758.62 + \$355.98).</li> <li>One specific issue needs improvement.</li> </ul>										
Upper Cumberland	<b>Upper Cumberland Development District</b>	6/14/2019	6/27/2019	7/31/2019	8/26/2019	10/8/2019					No
	<ul style="list-style-type: none"> <li>Case management needs improvement: participant applications, documentation for provided services, upload of supportive documentation to verify eligibility, provide case notes regarding interactions with participants.</li> <li>Property inventory system needs improvement: (a) inventory listing contains entries that were not purchased with grant funds received from TDLWD. (b) Property inventory contains items that are not required to be listed. (c) The property inventory listing should show the actual purchase price of the piece of equipment. Staff to the board requested to purchase two laptops which included documentation on the sales price. When these laptops were added to the inventory listing, the original sales price was used, as opposed to the actual cost of the laptops. As a result we question \$181.62 (e.g. \$2,090.80 - \$1,909.99 per laptop), which is the amount over the approved purchase amount. (d) Some equipment items are shown as missing, but the monitors were provided documentation indicating that the equipment items were surplus. The inventory listing should be updated to reflect that these pieces of equipment were actually surplus, as opposed to missing. (e) Date of surplus is missing on inventory listing.</li> <li>Out of period expenditures were charged to grants, resulting in questioned costs of \$1,114.60. Charges in the amount of \$758.62 were allocated to grant LW07P173MNSWA17. Also, charges in the amount of \$355.98 were allocated to grant LW07F174MNSWA17. As a result of this error, we question costs of \$1,114.60 (e.g. \$758.62 + \$355.98).</li> <li>One specific issue needs improvement.</li> </ul>										
Northern Middle	<b>North Tennessee Workforce Board</b>	9/17/2019	10/30/2019								No
	<ul style="list-style-type: none"> <li>One specific issue needs improvement.</li> </ul>										
South Middle	<b>South Central Tennessee Development District</b>	9/17/2019	10/30/2019								No
	<ul style="list-style-type: none"> <li>One specific issue needs improvement.</li> <li>Questioned cost of \$21.56 were charged to a grant agreement.</li> <li>Agency may not meet the Youth 20% Work Experience requirement, as required by Title I of WIOA.</li> <li>Property management needs improvement, which resulted in questioned costs of \$3,587.96.</li> </ul>										
Northwest	<b>Northwest Tennessee Workforce Board, Inc.</b>	7/2/2019	7/23/2019	8/20/2019	8/26/2019	10/8/2019					No
	<ul style="list-style-type: none"> <li>Case management needs improvement: participant applications, documentation for provided services, upload of supportive documentation to verify eligibility, provide case notes regarding interactions with participants.</li> <li>One specific issue needs improvement.</li> </ul>										
Southwest	<b>Southwest Human Resources Agency</b>										No
	<ul style="list-style-type: none"> <li>Out-of-period expenditures were charged to grants, resulting in questioned costs of \$3,167.47. April 2019 (\$1,511.12) and June (\$1,656.35) were charged to grants LWGMF181MNSWA18, LWGMF181TFSWA18, and LWGMF182TFSWA18 (i.e., Fund 324). Results in a questioned cost of \$3,167.47.</li> <li>Travel reimbursements that were greater than the state's travel regulations were charged to various grants, which resulted in questioned costs of \$621.97. Grants were charged \$0.545 or \$0.535 per mile, instead of \$0.47 per mile as stated in the state's travel regulations. LWGMF181ADULT18 (\$299.30), LWGMF191ADULT19 (\$303.58), Fund 324 (\$19.09)</li> <li>Subrecipient needs to improve fiscal monitoring of the One-Stop Operator and Career Service Provider.</li> <li>Questioned costs were charged to grant agreements: (a) WIN paid sales tax of \$7.86 for janitorial supplies (\$1.26 allocated to LWGMF181DSLWK19, \$6.60 allocated to LWGMF181ADULT19) (b) \$162.17 was reimbursed to an employee for various items such as jars, glass bottles, decorations, food, etc. (\$63.25 to LW13F181ADULT18, \$12.97 to LW13P171DSLWK18, \$85.95 to LW13P171YOUTH18) (c) \$6.68 was reimbursed to an employee for meeting supplies and charged to Fund 324</li> <li>Financial reports were not submitted timely. Of 177 reports, we determined 17 (9.6%) were not submitted timely.</li> </ul>										
-	<b>Tennessee Career Services Agency</b>	3/21/2019									Yes
No findings noted during PAR review.											
-	<b>Meritan</b>	4/25/2019	5/28/2019	6/13/2019	7/26/2019	8/2/2019	8/5/2019	8/21/2019			No
	<ul style="list-style-type: none"> <li>Expenditures charged against the incorrect grant. Employee reimbursed for June 2018 mileage on July 2018 contract. Paid from grant LW19P181SCSEP19 for amount of \$118.68. Payment occurred for on a grant that was not yet open for activity from a previous grant cycle.</li> <li>Meritan staff entered wrong employee ID and charged \$73.70 to LW19P181SCSEP19 in error. Charged to participant's ID number rather than nurse's ID number and system automatically generated payment to former participant.</li> <li>Travel amount of \$21.16 charged to LW19P171SCSEP18. It appears that both the employee due the travel reimbursement and the employee who reimbursed the claim were paid for the travel expense.</li> </ul>										
-	<b>Goodwill Industries Knoxville</b>	8/1/2019	8/7/2019	9/9/2019							Yes
<ul style="list-style-type: none"> <li>Goodwill Industries Knoxville, Inc. is not reporting their matching expenditures on the correct line in either the monthly financial status reports or the final close-out reports.</li> <li>A specific change was made in reporting to match expenditures to line 7 of the report.</li> </ul>											
-	<b>Goodwill Industries Middle Tennessee</b>										No
-											
-	<b>University of Tennessee (SNAP E&amp;T) Knoxville</b>	9/9/2019	10/22/2019								No
	<ul style="list-style-type: none"> <li>The University of Tennessee is not reporting their matching expenditures on the correct line in either the monthly financial status reports or the final close-out report. Only two of the five monitored grants have this matching expenditure requirement.</li> <li>The grants between Tennessee Department of Labor and Workforce Development (TDLWD) and the University of Tennessee require monthly financial reports and a close-out report...the monthly financial report is due 25 days after the end of the applicable month, while the close-out report is due 45 days after the end of the grant. Approximately 45% of the tested financial reports were not submitted timely.</li> </ul>										

# APPENDIX F



## LWDB/AJC System Questionnaire-WIOA Duties and Controls Review for LWDA \_\_\_\_\_

### I. Local Governance:

- a. Interlocal Agreements are in place and executed Yes No
- b. Partnership Agreements are in place and executed Yes No
- c. Board roster compliant with WIOA composition standards Yes No
- d. Did the LWDB hire a director and other staff to assist in carrying out the functions of the Local Board? **(PAR REVIEW ON SITE)** Yes No
  - 1. If yes, is the board a 501c and are employees/staff hired direct? **(PAR REVIEW ON SITE)** Yes No
  - 2. If yes, has the LWDB established and applied a set of qualifications for the position of director that ensure the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the Local Board? Yes No  
**(PAR MUST VERIFY BY REVIEWING THE DOCUMENT APPROVED BY LWDB)**
- e. Do Local Board staff assist the Local Board in any capacity other than to fulfill the required functions of WIOA Section 107(d)? **(PAR REVIEW ON SITE)** Yes No
- f. Did the LWDB select an entity to staff the Local Board that provides additional workforce functions beyond the functions described in WIOA Section 107(d)? **(PAR REVIEW ON SITE)** Yes No
  - 1. If an entity that provides additional workforce functions beyond the functions described at WIOA Section 107(d) is serving as staff to the board, has the board and entity executed an agreement as required and outlined in 20 CFR 679.430 that clarifies their roles and responsibilities? **(LWDB ANSWERS, PAR VERIFIES)** Yes No
  - 2. Is this agreement separate from the Interlocal and Partnership Agreements?

(LWDB ANSWERS, PAR VERIFIES)

Yes No

- g. Have the CLEO and Fiscal Agent executed a contract/MOU clearly outlining the Fiscal Agent's roles and responsibilities? (LWDB ANSWERS, PAR VERIFIES)

Yes No

## II. Firewall Provisions:

- a. Board staff are properly separated from the delivery of services (with the exception of business services, which may be delivered by LWDB or a combination of LWDB and contracted provider. (LWDB ANSWERS, PAR VERIFIES)

Yes No

- b. Is the OSO clearly the functional manager of the AJC? (LWDB ANSWERS, PAR VERIFIES)

Yes No

- c. If the OSO's entity is also the provider of career services, there are clear firewalls and separations of duties in place between OSO function staff and career service staff.

(LWDB ANSWERS, PAR VERIFIES)

Yes No N/A

- d. Contracts or MOU are in place that clearly outline the delivery of business services between Board staff and service provider. (LWDB ANSWERS, PAR VERIFIES)

Yes No

- e. Is Board staff physically located in any of the AJC sites? (LWDB ANSWERS, PAR VERIFIES)

Yes No

## III. Career Services:

- a. Are at least two staff present at all times to meet the scheduling requirements for the mobile American Job Center?

Yes No

(LWDB ANSWERS, PAR VERIFIES)

- b. Please answer the following questions for the front desk/check in process.

(LWDB ANSWERS, PAR VERIFIES)

- Is the priority of service process for veterans and eligible spouses being observed during check-in?

Yes No

- Is there a process for initial intake being conducted by the intake unit?

Yes No

- Are appropriate referrals to partner staff occurring during intake?

Yes No

- Is the VOS greeter being utilized to count traffic to the center?

Yes No

- c. Is "Meaningful UI Assistance" provided in the comprehensive and affiliate sites?  
Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

*Meaningful Assistance is defined in 20 CFR 678.430 as:*

- *Providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time.*
- *The Combined State plan for Tennessee states that assistance with a UI claim will be provided utilizing Zendesk and Zoprim chat.*

- d. Is there a referral process as outlined in TEGl 16:16 for both internal and external partners? **(LWDB ANSWERS, PAR VERIFIES)**

*Section 8 of the MOU-IFA guidance states:*

*"Parties to the MOU must provide specifics in the One-Stop Service Delivery MOU detailing how Partners will refer individuals to appropriate services and activities and receive feedback on the outcome of the referral." An example of a referral process with an external partner would include a form (electronic or paper) that is filled out regarding the needs of the customer, which is then scanned and emailed to the external partner. This form would include a section for the external partner to fill out and return indicating the steps taken with the participant.*

#### **IV. Fiscal:**

- a. The LWDB developed a budget? **(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**  
Yes No
- b. Are mechanisms are in place to track the 40% minimum participant cost rate?  
Yes No
- c. Are mechanisms are in place to track the 80% obligation rate?  
Yes No
- d. Are required fiscal reports submitted timely?  
Yes No

**(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**

#### **V. Monitoring:**

- a. Are the AJCs adequately staffed? **(LWDB ANSWERS THIS AND FOLLOWING TWO QUESTIONS, PAR VERIFIES)**  
Yes No
1. How many staff are OSO? How many are career services?
  2. How many are staff to the Board?

- b. Has the LWDB established a formal monitoring plan and guide, including criteria to evaluate One-Stop Operator performance? Yes No

**(LWDBS MUST HAVE THIS DOCUMENT: MUST BE SUBMITTED TO TDLWD AND AVAILABLE AT AJC LOCATION FOR ON-SITE REVIEW BY PAR)**

1. Is this process conducted at least annually? Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

- c. Is the OSO monitoring and executing the agreements with partners as outlined in the LWDA's MOU? Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

- d. Is the OSO reporting to the LWDB and their staff (board staff) on operations, performance, and continuous improvement recommendations? Yes No

**(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**

- e. Is the monitoring process formalized and reported during LWDB meetings, to the CLEO, and to TDLWD? Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

- f. Has the local AJC complaint log been regularly submitted to TDLWD, Compliance and Policy unit, for review? Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

## **VI. Businesses Services Team (BST):**

- a. Is a training mechanism in place—including continued training—to ensure that partner staff understands how to input employer activities in VOS? Yes No

**(LWDB ANSWERS, PAR VERIFIES)**

## **VII. Youth Services:**

Were youth services allocated through TDLWD under WIOA section 128(b) contracted out to eligible youth service providers? **(LWDB ANSWERS, PAR VERIFIES)**

Yes No

## **VIII. RESEA:**

- a. Are RESEA services provided through contracted service providers?

**(LWDB ANSWERS, PAR VERIFIES)**

Yes No

- b. Is there a local process for referring and co-enrolling RESEA participants into WIOA?

Yes No

**(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)**

- c. Were fifty percent (50%) of RESEA participants referred to Title I services? Yes No

(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)

- d. Were twenty-five percent (25%) of the RESEA referred participants co-enrolled in Title I services? Yes No

(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)

**IX. SNAP E&T:**

- a. Is there a process for referring and co-enrolling SNAP E&T participants into WIOA? Yes No

(LWDB ANSWERS, PAR RECORDS RESPONSE AND SNAP STAFF VERIFIES ACCURACY)

**X. SCSEP:**

- a. Are SCSEP services provided through contracted service providers? Yes No

(LWDB ANSWERS, PAR VERIFIES)

**XI. Additional Information:**

Provide an organizational chart for the One-Stop Operator and Career Service Provider.

Provide an organizational chart for the fiscal agent and staff to the LWDB.

# APPENDIX G

WIOA Title I Adult and Dislocated Worker Attribute Sheet		Yes	No	N/A	Comments:
<b>Part A. Program Eligibility</b>					
State ID:					
Participant Name:					
Participant Birth Date:					
Participant Age:					
Social Security Number: (card uploaded)					
Citizenship Status:					
Selective Service: (for males born after December 31, 1959)					
Veteran Documentation:					
Disability:					
Educational Status at Participation:					
<ul style="list-style-type: none"> <li>In school; post-secondary</li> <li>Not attending school or secondary school dropout</li> <li>Not attending school; secondary school graduate or has a recognized equivalent</li> <li>Not attending school; within age of compulsory school attendance</li> </ul>					
Employment Status at Participation:					
<ul style="list-style-type: none"> <li>Employed:</li> <li>Unemployed:</li> <li>Under-employed:</li> <li>Long-term unemployed (27 consecutive weeks or more)</li> <li>Employed, but received notice of termination of employment or military separation</li> </ul>					
Low-income Individual:					
Family Size: [insert number here] Individuals					
Annualized Income: \$(insert sum here)					
<ul style="list-style-type: none"> <li>Supplemental Nutrition Assistance Program (SNAP):</li> <li>Temporary Assistance for Needy Families (TANF):</li> <li>Other Public Assistance:</li> <li>Social Security Income (SSI) /</li> <li>Social Security Disability Income (SSDI):</li> <li>Homeless:</li> <li>Displaced homemaker:</li> </ul>					
Priority of Service:					
<ul style="list-style-type: none"> <li>Basic-skills deficient:</li> <li>Foster youth:</li> </ul>					
Dislocated Worker:					
<ul style="list-style-type: none"> <li>Date of dislocation: mm/dd/yyyy</li> <li>Category: [insert category here]</li> </ul>					
Signed Documents:					
<ul style="list-style-type: none"> <li>WIOA VOS application: mm/dd/yyyy</li> <li>IEP:</li> <li>Waivers: (grievance and EO along with local waivers)</li> </ul>					
IEP/OAS:					
Goals/Objectives listed in the IEP:					
<b>Part B. Program Activity</b>					
Application Date: mm/dd/yyyy					
Participation Date: mm/dd/yyyy					
Co-enrolled in partner program:					
Activities in good standing? (i.e. actual begin date entered, no system closed, etc.)					
Initial Assessment/Test results:					
Occupational Skills Training (ITA) (20 CFR Part 681, Subpart C):					
Activity code entered: [insert activity code here]					
Acceptance letter with dates uploaded: (meets the LWDB-approved policy for time allotment)					
Cost sheet from ETP uploaded: (meets the LWDB-approved policy for cost limitation)					
Activity dates match contract dates:					
Receiving Pell Grant:					
Attendance records uploaded:					
Grades/Case notes indicating progress of participant:					
Activity exit status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Currently enrolled:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Voided:</li> </ul>					
Measurable skills gain entered:					
Credentialed uploaded:					
Credentialed entered:					
<b>On-the-Job Training (OJT) (20 CFR 680.700 - 680.730)</b>					
Activity code entered: [insert activity code here]					
OJT contract present:					
Training outline present:					
Attendance records uploaded:					
Number of hours worked documented:					
Activity exit status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Currently enrolled:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Voided</li> </ul>					
Participant retained beyond end of OJT:					
<b>Work Experience / Apprenticeship (20 CFR 680.180)</b>					
Activity code entered: [insert activity code here]					
Actual Begin Date: mm/dd/yyyy					
Time sheets:					
Attendance records uploaded:					
<b>Supportive Service Activities (20 CFR 680.900 - 680.920)</b>					
Activity code entered: [insert activity code here]					
Justification for supportive services: (i.e. participating in training/employment activity; in an activity above)					
Distribution of supportive services uploaded: (supportive service with participant signature and date)					
Reference to payment request / invoices / Vouchers:					
Attendance records:					
Supportive services in accordance with local policy:					
<b>Exit / Follow-Up Information (TEGL 10-16)</b>					
Closure date (last day of service): mm/dd/yyyy					
Educational status at exit:					
<ul style="list-style-type: none"> <li>In school; post-secondary</li> <li>Not attending school or secondary school dropout</li> <li>Not attending school; secondary school graduate or has a recognized equivalent</li> </ul>					
Activity Exit Status:					
<ul style="list-style-type: none"> <li>Verification present (case noted/uploaded):</li> </ul>					
Entered post-secondary:					
<ul style="list-style-type: none"> <li>Verification present (case noted/uploaded):</li> </ul>					
Follow-up services provided:					
Follow-up activity entered:					
Follow-up quarters completed to date:					
Case notes adequate to follow participant's progress throughout services:					

Reemployment Services and Eligibility Assessments (RESEA) Attribute Sheet	Yes	No	N/A	Comments:
<b>Program Eligibility</b>				
State ID:				
Participant Name:				
Participant Birth Date:				
Participant Age:				
Activities:				
<ul style="list-style-type: none"> <li>Either 592 or 593 activity is present dated same as the orientation date:</li> </ul>				
<ul style="list-style-type: none"> <li>211 activity present if referred to Title I per case notes (19R should be present if after April 2018):</li> </ul>				
<ul style="list-style-type: none"> <li>210 activity present if participant does not have a high school diploma: (138 should be present after July 1, 2019)</li> </ul>				
<ul style="list-style-type: none"> <li>194 activity present if claimant is exempt:</li> </ul>				
<ul style="list-style-type: none"> <li>193 activity present if claimant gained employment:</li> </ul>				
<ul style="list-style-type: none"> <li>192 activity present if claimant missed a meeting:</li> </ul>				
<ul style="list-style-type: none"> <li>19B activity present if claimant refused services:</li> </ul>				
<ul style="list-style-type: none"> <li>19A activity present if claimant attended a meeting after they were assigned a 192 activity:</li> </ul>				
<ul style="list-style-type: none"> <li>198 activity present if RESEA program has been completed:</li> </ul>				
<ul style="list-style-type: none"> <li>Activities associated with RESEA have not been duplicated by staff at the AJC:</li> </ul>				
Documentation:				
<ul style="list-style-type: none"> <li>Resume present if claimant completed the program:</li> </ul>				
<ul style="list-style-type: none"> <li>If exempt, proper documentation present:</li> </ul>				
<ul style="list-style-type: none"> <li>All documentation is uploaded for orientation visit:</li> </ul>				
<ul style="list-style-type: none"> <li>All documentation is uploaded for subsequent return:</li> </ul>				
<ul style="list-style-type: none"> <li>Eligibility review documentation is present if claimant indicated a potential eligibility issue:</li> </ul>				
<ul style="list-style-type: none"> <li>Documents are uploaded using the appropriate naming format:</li> </ul>				
EDPs and Case Notes:				
<ul style="list-style-type: none"> <li>Goals &amp; action steps are clearly outlined:</li> </ul>				
<ul style="list-style-type: none"> <li>Proper case notes:</li> </ul>				

Senior Community Service Employment Program (SCSEP) Attribute Sheet		Yes	No	N/A	Comments:
<b>Part A. Program Eligibility (20 CFR Part 641.100)</b>					
State ID:					
Participant Name:					
Participant Birth Date:					
Participant Age:					
Social Security Number: (and spouse)					
Citizenship Status:					
Selective Service: (for males born after December 31, 1959)					
Veteran Documentation:					
Disability:					
Proof of Tennessee residency:					
Participant registered at AIC prior to enrollment:					
Income status:					
<ul style="list-style-type: none"> <li>Not more than 125% of Federal poverty guidelines</li> <li>Income eligibility recertified at least every 12 months</li> </ul>					
Employment status & Job search:					
<ul style="list-style-type: none"> <li>Statement of non-employment:</li> <li>Job search assistance provided:</li> <li>Use of AIC system and referrals:</li> <li>Documentation of job searches:</li> </ul>					
Required documentation (20 CFR 614.302(d)):					
<ul style="list-style-type: none"> <li>Initial assessment:</li> <li>Annual assessment:</li> <li>Family size certification form:</li> <li>Participant training description:</li> <li>Progress agreements:</li> <li>Documentation of training hours:</li> <li>Return to work documentation:</li> <li>Request for leave of absence:</li> <li>Evidence that the assessment results were used to determine the most suitable assignment:</li> <li>Alternative assignments were considered if it was determined that alternative host agency would provide greater opportunity</li> </ul>					
Signed documents:					
<ul style="list-style-type: none"> <li>WIOA VOS application:</li> <li>Progress agreements between participant and project present:</li> <li>Progress of participant evaluated and commented every 6 months:</li> <li>Signatures of both participant and host agency are on each time sheet:</li> <li>Documented copies of agenda and sign-in sheets for required quarterly meetings are present:</li> <li>Confidential statement of income:</li> <li>SCSEP participation form:</li> <li>IEP:</li> <li>Orientation training checklist:</li> <li>SCSEP Privacy Act statement:</li> <li>Participant rights and responsibilities:</li> <li>Record for offer of physical examination:</li> <li>Participant task form:</li> <li>Participant and project agreement:</li> <li>OAS:</li> </ul>					
Goals/Objectives listed in the IEP:					
<b>Part B. Program Activity</b>					
Application Date: mm/dd/yyyy					
Participation Date: mm/dd/yyyy					
Assigned to a case manager?					
Activities in good standing? (i.e. actual begin date entered, no system closed, etc.)					
<b>Assessments / Individual Employment Plan (20 CFR 641.535)</b>					
Skills / Attributes / Work History Assignment:					
Change in occupational goal assessment:					
Transitional assessment:					
Two assessments per 12 month period:					
Computer literacy assessment:					
Waiver activity entered:					
IEP documenting assessment and job-related goal completed within the first month of enrollment date - initial goal is unsubsidized employment:					
IEP is updated at least as frequently as assessments occur:					
IEP is modified as necessary to reflect other approaches to self-sufficiency if it became clear that unsubsidized employment is not feasible:					
IEP contains specific goals and completion dates:					
IEP follow-up/review is present:					
Provision in IEP to transition to other services if participant has reached individual durational limit or will not otherwise achieve subsidized employment:					
Progress review dates are noted in IEP					
Is the sub-grantee using the IEP to determine when it is appropriate to rotate participant through assignments, with the goal of achieving unsubsidized employment?					
Participant is receiving training on job seeking skills - indicate the date the training was provided in the comments section:					
Training is part of the IEP and case notes:					
Training records kept in accordance with DLRWD/SCSEP policy:					
Can the sub-grantee produce documentation of training hours?					
<b>Supportive Services (20 CFR 641.540)</b>					
Receiving supportive services:					
Services are at "no cost" or "reduced cost":					
Job search activity verification:					
Receipts for travel, lodging, meals					
Referrals made to formal assessments and partner agencies (if needed):					
Follow-up being conducted with the participant within the first 6 months to determine if supportive services are needed to maintain training:					
<b>Orientation / Training (20 CFR 641.535)</b>					
Documentation of participant attendance at one workshop training per quarter:					
Evidence that SCSEP orientation was provided at the time of enrollment or prior to the first day at a host agency and compensated:					
Documentation uploaded / Action completed:					
<b>Exit / Follow-Up Information</b>					
Exit date: mm/dd/yyyy					
Active no longer than 48 months:					
Exit form:					
<ul style="list-style-type: none"> <li>Verification present (case note):</li> <li>Documentation that follow-up is being conducted on participant if obtained unsubsidized employment:</li> <li>Proper documentation when termination for cause present:</li> <li>Participant was provided a 30 day written notice that includes the reason for any ineligibility determination:</li> </ul>					
<b>Follow-Up Services Provided</b>					
<ul style="list-style-type: none"> <li>Follow-up activity entered:</li> <li>Follow-up quarters completed to date:</li> <li>Case notes adequate to follow participant's progress throughout services:</li> </ul>					

Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) Attribute Sheet		Yes	No	N/A	Comments:
<b>Overview</b>					
State ID:					
Participant Name:					
Participant Birth Date:					
Participant Age:					
Region/Agency:					
Number of Participants Who Attended Orientation:					
Number of Participants Placed in an Approved Component:					
<b>Part A. Program Eligibility</b>					
• Scheduled an initial appointment within 10 business days of referral date					
• Appointment marked as 'attended', 'no show', or 'rescheduled'					
• SNAP Application completed					
• 615 Activity Code entered for completion of initial appointment (with actual date the same date as the initial appointment)					
• 205 Activity Code entered for IEP (with actual date the same date as the initial appointment)					
• Voluntary participation form signed by participant and uploaded					
• Follow-up appointment scheduled no later than 30 days from last attended appointment					
• A DHS status notice sent within 2-5 business days after last appointment					
• Status notice sent a minimum of each 30 days					
• Case Manager assigned					
• Referred to an approved component					
• Enrolled in an appropriate component					
• Correct activity code used for approved component					
• Activity code begin date, projected end date, and actual end dates entered correctly					
• For able-bodied adults with disabilities (ABAWDs), monthly DHS status notices list how many hours are met through SNAP E&T					
• If employment obtained, employment information has been recorded					
• If training has been completed, credential information has been recorded in Jobs4TN (if applicable)					
Documentation:					
• Voluntary participant agreement signed and uploaded					
• Attendance documentation uploaded for all transportation assistance issued through SNAP E&T					
• Job search training activity tracker uploaded for those with a 634 activity code					
• SNAP E&T vouchers uploaded					
Case Notes:					
Initial appointment case note:					
1. States an intake/assessment was completed					
2. Lists barriers to employment					
3. Lists goal(s) of program					
4. Lists action steps to complete goal					
• Individual employment plan steps are updated in case notes					
• Case notes document all funding that is being provided by E&T					
• Case note documents any referrals made to partner programs					
• Case not entered for the 30 day follow-up appointments while participating					
• Follow-up case notes are clear, detailed, and timely					

Trade Adjustment Assistance (TAA) Attribute Sheet		Yes	No	N/A	Comments:
<b>Part A. Program Eligibility</b> (20 CFR 617 Subpart C - Reemployment Services; TEGJ 11-02, 22-08, 10-11, 5-15)					
Case ID:					
Participant Name:					
Participant Birth Date:					
Participant Age:					
Wagner-Peyser Application: (prepared & completed)					
Social Security Number: (last 4 entered)					
Citizenship Status:					
Selective Service: (for males born after December 31, 1959)					
Veteran Documentation:					
Disability:					
Educational Status at Participation:					
<ul style="list-style-type: none"> <li>High School graduate:</li> <li>Past credentials obtained:</li> <li>Copy of past credentials uploaded:</li> </ul>					
Employment Status and Job Search:					
<ul style="list-style-type: none"> <li>Resume uploaded:</li> <li>Virtual recruiter completed:</li> <li>Job search conducted:</li> </ul>					
TAA Program Eligibility Determination:					
<ul style="list-style-type: none"> <li>TAA Eligibility Application: (completed and saved)</li> <li>Petition number:</li> <li>IEP goals &amp; objectives listed:</li> <li>Individual Employment Plan: (signed)</li> </ul>					
Required Program Activities:					
<ul style="list-style-type: none"> <li>Initial Assessment (Activity Code 302)</li> <li>Attended Rapid Response (Activity Code 130)</li> <li>Developed Service Strategies/IEP (Activity Code 205)</li> <li>Provision of Labor Market Research (Activity Code 307)</li> <li>Referral to Job Search (Activity Code 135)</li> </ul>					
Training Request Online & Documentation (training packet uploaded as one document):					
<ul style="list-style-type: none"> <li>Training Financial Support Statement:</li> <li>Worker Training Agreement &amp; Responsibilities: (08-1092, signed)</li> <li>Assessment Referral (08-0788):</li> <li>Assessment scores:</li> <li>Demand search, what was used:</li> <li>Academics plan/course outline:</li> <li>Detailed cost sheet per term:</li> <li>Signature of authority (with signature and email):</li> <li>Dates verified/School calendar:</li> <li>School comparison (if private institution):</li> <li>Mileage documentation:</li> <li>Willing to commute (LR 1085, if appropriate):</li> </ul>					
<b>Part B. Training Activity</b> (20 CFR 617 Subpart C - Reemployment Services; TEGJ 11-02, 22-08, 10-11, 5-15)					
Application Date: mm/dd/yyyy					
Participation Date: mm/dd/yyyy					
Training activity code entered:					
Bond-fide date (entered & accurate):					
Activity dates (match actual training dates):					
Budget meets reasonable cost:					
Training application (signed & uploaded):					
Training application (seweration - email):					
Vouchers & Provider Invoice match:					
Vouchers reconciled:					
Measurable skills gain entered & current:					
Case notes/notes indicating progress of participant:					
Attendance certifications (uploaded weekly):					
Waiver completed/updated (if applicable):					
Waiver uploaded (signed & uploaded):					
30-day waiver (review completed):					
Request for completion of TRA benefits (LR-1106):					
Signed & submitted (if applicable):					
Verification of completion 13 out of the last 30 weeks of training for completion TRA benefits (uploaded):					
Subsistence/Transportation Payments:					
Subsistent While in Training (Activity Code 832)				Actual Begin Date: mm/dd/yyyy	
TAA-Approved Travel in Training (Activity Code 833)				Actual Begin Date: mm/dd/yyyy	
Activity dates match actual training dates:					
Budget meets reasonable cost:					
Vouchers reconciled:					
Activity Exit Status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Unknown status:</li> <li>Voided</li> </ul>					
Credential entered:					
Credential uploaded into Jobs4TN:					
<b>Part C. Job Search Allowance</b> (20 CFR 617 Subpart D - Job Search Allowances; TEGJ 11-02, 22-08, 10-11, 5-15)					
Activity Code entered (237):				Actual Begin Date: mm/dd/yyyy	
Job Search Allowance application (LR-1117): (signed & uploaded)					
Job Search Activity verification (LR-1115): (signed & uploaded)					
Receipts for travel, lodging, meals:					
Three sources of mileage verification:					
Budget and payment less than or equal to \$1,250:					
Activity Exit Status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Unknown status:</li> <li>Voided</li> </ul>					
<b>Part D. Relocation Allowance</b> (20 CFR 617 Subpart E - Relocation Allowances; TEGJ 11-02, 22-08, 10-11, 5-15)					
Activity Code entered (217):				Actual Begin Date: mm/dd/yyyy	
Request for relocation assistance (LR-435):					
Relocation approval packet:					
<ul style="list-style-type: none"> <li>Three estimates for moving expenses:</li> <li>Three sources of mileage verification:</li> <li>Receipts of incurred costs:</li> </ul>					
Budget & payment = 90% of costs incurred: Lump sum = \$1,250					
Activity Exit Status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Unknown status:</li> <li>Voided</li> </ul>					
<b>Part E. ATAA/RTAA</b> (20 CFR 617 Subpart H - Reemployment Trade Adjustment Assistance; TEGJ 22-08, 10-11, 5-15)					
Wage Subsidy Activity entered (280):				Actual Begin Date: mm/dd/yyyy	
Request for RTAA in file (LR-1053): (signed & uploaded as part of the RTAA packet)					
Last check stub from previous employer: (uploaded as part of the RTAA packet)					
First check stub from new employer: (uploaded as part of the RTAA packet)					
Request for reemployment data (LR-1122) (signed & uploaded as part of the RTAA packet)					
Verification of employment for monthly wage supplement (signed & uploaded as part of the RTAA packet)					
Affidavit for RTAA regarding Trade Affected Separating Employer (LR-1049): (signed & uploaded as part of the RTAA packet)					
Activity Exit Status:					
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Unknown status:</li> <li>Voided</li> </ul>					
<b>Additional Required Information</b>					
WIDA application				Actual Begin Date: mm/dd/yyyy	
Document naming conventions are followed:					
Release of information (signed & uploaded):					
<b>Exit/Follow-Up Information (20 CFR 681.500)</b>					
Closure date (last day of service):				Actual Begin Date: mm/dd/yyyy	
Entered Employment:					
<ul style="list-style-type: none"> <li>Verification present (see notes):</li> </ul>					
Follow-Up Services Provided:					
Follow-up activity entered:					
Follow-up quarters completed to date:					
Case notes adequate to follow participant's progress throughout services:					

WIOA Title I Youth Attribute Sheet				Yes	No	N/A	Comments
<b>Part A. Program Eligibility</b>							
State ID:							
Participant Name:							
Participant Birth Date:							
Participant Age:							
Social Security Number: (last upload)							
Citizenship Status:							
Selective Service: (for males born after December 31, 1959)							
Veteran Documentation:							
Disability:							
Educational Status at Participation:							
<ul style="list-style-type: none"> <li>In school, secondary or less:</li> <li>In school, alternative school:</li> <li>In school, post-secondary:</li> <li>Not attending school or secondary school dropout:</li> <li>Not attending school; secondary school graduate or has a recognized equivalent:</li> <li>Not attending school; within age of compulsory school attendance:</li> </ul>							
Employment Status at Participation:							
<ul style="list-style-type: none"> <li>Employed:</li> <li>Unemployed:</li> <li>Under employed:</li> <li>Long-term unemployed (27 consecutive weeks or more):</li> </ul>							
Low-Income Individual:							
Family Size: [insert number here] Individuals							
Annualized Income: \$[insert sum here]							
<ul style="list-style-type: none"> <li>Supplemental Nutrition Assistance Program (SNAP):</li> <li>Temporary Assistance for Needy Families (TANF):</li> <li>Other Public Assistance:</li> <li>Social Security Income (SSI):</li> <li>Social Security Disability Income (SSDI):</li> <li>High-poverty area:</li> <li>Free or Reduced lunch:</li> </ul>							
Barriers identified:							
<ul style="list-style-type: none"> <li>Basic-skills deficient:</li> <li>Homeless:</li> <li>English language learner:</li> <li>Foster care:</li> <li>An offender:</li> <li>Pregnant/parenting:</li> <li>Individual with a disability:</li> <li>School dropout:</li> <li>Within compulsory school attendance but has not attended for most recent calendar year:</li> <li>Requires additional assistance: (in accordance with state policy)</li> </ul>							
Signed Documents:							
<ul style="list-style-type: none"> <li>WIOA VOS application: mm/dd/yyyy</li> <li>IEP/ISS:</li> <li>OAS:</li> <li>Waivers: (give notice and EO along with local waivers)</li> </ul>							
IEP/OAS:							
Goals/Objectives listed in the IEP:							
<b>Part B. Program Activity</b>							
Application Date: mm/dd/yyyy							
Participation Date: mm/dd/yyyy							
Co-enrolled in partner program:							
Assigned to a case manager?							
Activities in good standing? (i.e. actual begin date entered, not system closed, etc.)							
<b>Occupational Skills Training (ITA) (20 CFR 681.540):</b>							
Activity code entered: [insert activity code here]							
Acceptance letter with dates uploaded:							
Inserts the WIOB-approved policy for time allotment:							
Cost sheet from ETP uploaded: (inserts the WIOB-approved policy for cost limitation)							
Voucher created? (matches the cost sheet and dates of acceptance letter)							
Activity dates match contract dates:							
Attendance records uploaded:							
Grades/Case notes indicating progress of participant:							
Activity exit status:							
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Currently enrolled:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Voided:</li> </ul>							
Benchmark entered: (capture performance at progress report periods of training)							
Measurable skills gain entered:							
Credential uploaded:							
<b>Work Experience / Pre-Apprenticeship (20 CFR 681.480, 681.600, 681.620):</b>							
Activity code entered: [insert activity code here] Actual Begin Date: mm/dd/yyyy							
Time sheets/Attendance records uploaded:							
Training outline/Education component information present:							
Attendance records uploaded:							
Payment requests / Invoices / Vouchers:							
<b>On-the-Job Training (OJT) (20 CFR 680.700 - 680.730)</b>							
Activity code entered: [insert activity code here]							
OJT contract present:							
Training outline present:							
Attendance records uploaded:							
Number of hours worked documented:							
Activity exit status:							
<ul style="list-style-type: none"> <li>Successful completion:</li> <li>Currently enrolled:</li> <li>Unsuccessful completion:</li> <li>Dropped out of activity:</li> <li>Voided:</li> </ul>							
<b>Supportive Service Activities (20 CFR 680.900 - 680.920):</b>							
Activity code entered: [insert activity code here] Actual Begin Date: mm/dd/yyyy							
Justification for supportive services: (i.e. participating in training/employment activity in an activity above)							
Distribution of supportive services uploaded: (supportive service with participant signature and date)							
Payment request / Invoices / Vouchers:							
Attendance records:							
Supportive services in accordance with local policy:							
<b>Incentive / Bonus Activities (20 CFR 681.640):</b>							
Activity code entered: [insert activity code here] Actual Begin Date: mm/dd/yyyy							
Justification for incentive present: (i.e. tied to established goals, training/employment activity)							
Distribution of incentive uploaded: (supportive service with participant signature & date)							
Payment request / Invoices:							
Incentive services in accordance with local policy:							
<b>Exit / Follow-Up Information (20 CFR 681.580):</b>							
Closure date (last day of service): mm/dd/yyyy							
Educational Status at Exit:							
<ul style="list-style-type: none"> <li>In school, secondary or less:</li> <li>In school, alternative school:</li> <li>In school, post-secondary:</li> <li>Not attending school or secondary school dropout:</li> <li>Not attending school; secondary school graduate or has a recognized equivalent:</li> </ul>							
Entered employment:							
<ul style="list-style-type: none"> <li>Entered in VOS:</li> <li>Verification present (case noted/uploaded):</li> </ul>							
Entered Post-Secondary:							
<ul style="list-style-type: none"> <li>Verification present (case noted/uploaded):</li> </ul>							
Follow-up services provided:							
Follow-up quarters completed to date:							
Case notes adequate to follow participant's progress throughout services:							

# APPENDIX H



## Monitoring Tool: Equal Employment Opportunity

<b>Subrecipient:</b> <b>Date:</b> <b>Completed By:</b> <b>Review Date:</b> <b>TDLWD Monitor:</b>				
Has the Local Workforce Development Area (LWDA) appointed its equal opportunity officer for WIOA Title I services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Has the LWDA provided reasonable accommodations for persons with disability? If not, see below.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Does the LWDA provide initial and continuing notice (using the required nondiscrimination language) that it does not discriminate on any prohibited grounds?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
<b>Does the LWDA publish or broadcast program information in the news media? If so, does the LWDA indicate in the publications and broadcasts that:</b>				
The WIOA funded program or activity in question is an equal opportunity employer/program?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Auxiliary aids and services are available upon request to individuals with disabilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

### Monitoring Tool: Equal Employment Opportunity

Has the LWDA applied analysis to its programs in order to determine how best to deliver language assistance to individuals who are Limited English Proficient (LEP)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
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<b>If the analysis indicates the need for language assistance services, does the LWDA have in place one or more of the following oral interpretation services:</b>				
Bi-lingual staff?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Staff interpreters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Contract interpreters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Telephone interpretation?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	

Do the LWDA's written translation procedures fall within the "Safe Harbor" provisions?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
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<b>Does the LWDA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows:</b>				
With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
With knowledge of specialized terms and concepts of the program, vocabularies and phrases used by the LEP person?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

## Monitoring Tool: Equal Employment Opportunity

Does the LWDA have policies and procedures in place which ensure the following:				
Those interpreters must certify that they will deliver interpretations that are accurate and not biased?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Those interpreters shall accept payment for services only from the LWDA and never from the client?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWDA provide written translations of:				
Consent and complaint forms?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
A list of One-Stop partners and services offered?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Appeals documents?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Notices requiring a response from clients?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Information on the right to file complaints of discrimination?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Information on the provision of services to individuals with disabilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
State wage, hour, safety, and health information?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Notices of free language assistance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

Does the LWDA have procedures and policies in place which ensure planning and development of:				
Methods of identifying LEP individuals who need language assistance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

### Monitoring Tool: Equal Employment Opportunity

Training for staff on the available language services and how to use them?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Easily-accessible and widely-known notices of free language assistance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Training staff on monitoring interpreter activity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

Does the covered LWDA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified individuals who have physical and/or mental impairments?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Does the covered LWDA have policies and procedures in place that ensure that individuals with qualifying disabilities will be referred for auxiliary aids and services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Does the LWDA have in place communication devices, such as TTY or TDD, or an equally effective communication system, for participants with a hearing impairment?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

### Monitoring Tool: Equal Employment Opportunity

<p>If the LWDA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWDA have a written statement which details the reasons for reaching this conclusion?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>Comments:</p>
<p>Does the LWDA have clearly visible signage, at the primary entrances of each inaccessible facility that refers individuals, with disabilities, to information about accessible facilities?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>Comments:</p>
<p>Does the LWDA have the international symbol for accessibility at the primary entrances of each accessible facility?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>Comments:</p>

**Do the LWDA's published personnel policies and procedures prohibit actions defined in Section 37.11 of the implementing regulations? These are:**

<p>Intimidation and retaliation for filing a complaint or furnishing information regarding management of a WIOA assisted program, service, or activity.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>Comments:</p>
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### Monitoring Tool: Equal Employment Opportunity

Is the initial and continuing notice provided that discrimination is prohibited? Is it:				
In internal memoranda, both hard copy and electronic?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
In handbooks or manuals?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Made available to each participant and included in the participant's file?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Made available, in appropriate formats, to individuals with visual impairments?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Do the LWDA's orientations and other presentations to new employees, participants, employers and the general public include a discussion of the nondiscrimination and equal opportunity provisions applicable to WIOA programs?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Does the LWDA system have a complaint log which is used to record any complaints of discrimination?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:

### Monitoring Tool: Equal Employment Opportunity

Does the LWDA have documentation to ensure that all On-the-Job Training plans, contracts, and other similar agreements are non-discriminatory and contain provisions regarding non-discrimination and equal opportunity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
How does the LWDA provide disability awareness training for designated staff at the One-Stop Center?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
Has the contract agency received any discrimination complaints during the last fiscal year or during the current contract year? Explain.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
What assurances of compliance have been signed by the agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
When and by who were they signed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:
What documentation does the agency keep as proof of its non-discriminatory status?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments: